

EPA Jacket 84024-1

Vol.1

Material Sent for Data Extraction

Reg # 84024-1

Description: Amendment

☐ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 8/13/12

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☒ Decision #: 4662384

☐ Other Action/Comments: _____

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: David Liem

Phone: _____ Division: AD

Date: 8/21/12

Created February 3, 2011

4663-1
TASK ASSIGNMENT FORM
Antimicrobial Division/Regulatory Management Branches

ORIGINATOR/PRODUCT REVIEWER: <i>David Liem</i>				RMB II TEAM <i>24 32</i>			
Decision No: <i>4663-1</i>		Submission No: <i>918478</i>		EPA File Symbol/Reg No. <i>84024-1</i>			
PRIA Fee: \$ _____		Action Code: <i>302</i>					
GPRA:	FQPA x	Non-FQPA		Product Re-reg.			
PRIA:	ME-TOO <input type="checkbox"/>	New Use <input type="checkbox"/>	Old Chemical	New Chemical <input type="checkbox"/>	Amend w/data <input type="checkbox"/>		
	DAY	MONTH	YEAR				
APPLICATION DATE	<i>12</i>	<i>6</i>	2012				
EPA PIN DATE	<i>13</i>	<i>6</i>	2012				
DATE PM RECEIVED FROM FRONT END	<i>13</i>	<i>6</i>	2012				
DATE SENT TO SCIENCE			2012				
DATE RECEIVED FROM SCIENCE							
NEGOTIATED DUE DATE			DATE DUE OUT OF AGENCY				
Type of Data:	PSB Product Chemistry	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure/Residue

Comments: Please provide hard and electronic copy of deliverable(s).

Label Amendment, NO data changes requested by state of CA Department of Pesticide Regulation.

wend jacob

amend sent 10/12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 13, 2012

Robert M. Sielaty
TOXCEL, Toxicology & Regulatory Affairs
P.O. Box 363, 7140 Heritage Village Plaza,
Gainesville, VA 20156

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: JUSTEQ07
EPA Reg.#: 84024-1
Notification Date: June 12, 2012
Receipt Date: June 13, 2012

Dear Mr. Sielaty:

This acknowledges the receipt of your Amendment application dated June 12, 2012 in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended.

Proposed Label Amendment:

1. Clarification of the use of 2 fluid oz/1000-gallons of water yielding 1.0 ppm available chlorine
2. As per CDPR (California) request, "**Not for Use in California**", now applies to three use sites: Pulp & Paper Mill Influent Water System, Pulp & Paper Mill Process Water System and Shell Egg Pasteurizer Water Systems.
3. Addition of a "Warranty Statement for this product".

General Comment:

Based on the review of the material submitted, all the additional label amendments for Juste07 label (EPA Reg# 84024-1; version June 12, 2012; EPA pin-punch 6/13/12) are acceptable. Note: Agency's letter dated August 27, 2010 was also addressed and acceptable.

A copy of the accepted stamped label is enclosed for your record. Please submit one copy of your final printed label/labeling before distributing or selling the product bearing the revised label/labeling.

If you have any questions on this letter, please contact David Liem at 703-305-1284 or by email at liem.david@epa.gov

Sincerely

Monisha Harris
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Att: Stamped Accepted Label

Justeq07

Justeq07 is an effective agent for controlling algae, bacteria, and fungi that produce slime in recirculating condensing and cooling equipment and in reservoirs or ponds that serve as the source of boiler feedwater or cooling water. Justeq07 can also be used to control bacteria, algae and fungal slime in decorative fountains, air washers, paper mill water systems, and food, beverage, and industrial process pasteurizers.

ACTIVE INGREDIENTS:

Sodium hypochlorite 7.00%
Sodium bromide 1.50%

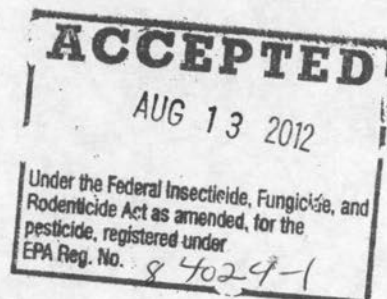
INERT INGREDIENTS 91.50%

Total 100.00%

Total Available chlorine = approximately 6.7%

Total Available Bromine = approximately 2.3%

**KEEP OUT OF REACH OF CHILDREN
DANGER**



FIRST AID

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses if present after the first 5 minutes then continue rinsing eye.
- Call a poison control center or a doctor for treatment advice.

If on skin or clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or a doctor for treatment advice.

If inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or a doctor for further treatment advice.

If swallowed:

- Call a poison control center or a doctor immediately for treatment advice.
- DO NOT INDUCE VOMITING, unless told to do so by the Poison Control Center or Doctor.
- Do not give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN:

Aspiration may cause lung damage. Probable mucosal damage may contraindicate the use of gastric lavage. Have the product container, label or MSDS with you when calling a poison control center or a doctor, or going for treatment. In case of Medical Emergency, call (630) 428-4143

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 84024 - 1

EPA Est. No.: 6484-WI-001

JUSTEQ LLC
2871 Crimson Ct.
Northbrook, IL 60062

Net Contents _____

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. CAUSES SKIN BURNS.

Do not get in eyes, on skin or on clothing. Wear protective goggles, face shield, safety glasses, and chemical-resistant gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board Regional Office of EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

COOLING PONDS, RESERVOIRS AND DECORATIVE FOUNTAINS

Justeq07 must be applied at the reservoir, pond, or fountain inlet or at a location that permits complete diffusion into the water at maximum retention time before reaching the outlet. Sufficient Justeq07 must be fed to maintain a total chlorine level of 1.0-4.0 ppm in all parts of the reservoir or pond (two fluid ounces per 1000 gallons of water yields about 1.0 ppm total chlorine).

INDUSTRIAL & COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS

Justeq07 must be applied directly to the cooling water at any section of the system where sufficient mixing will occur. Apply Justeq07 to the cooling water to provide a total chlorine level of 1.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.0 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.0 ppm throughout the systems. Check the total chlorine level with a test kit and additional product applied until a reading of 1.0-4.0 ppm is obtained at the bleed-off point. The product can be added to the system either continuously or intermittently or as needed to obtain the above residual. The frequency of feeding and dosage rate will depend upon the severity of the problem.

INDUSTRIAL PASTEURIZERS (Such as food, beverage, and industrial process pasteurizers)

For control of bacteria and fungi in industrial pasteurizers add 4 -8 ounces of Justeq07 per 1000 gallons of system water to achieve control. To maintain control add sufficient Justeq07 to maintain 2.0-4.0 ppm total chlorine throughout the system. (Two fluid ounces per 1000 gallons of water yields 1.0 ppm total chlorine).

SHELL EGG PASTEURIZER WATER SYSTEMS (not for use in California)

For control of bacteria, fungi and algal slime in shell egg pasteurizer water systems add 4-8 ounces of Justeq07 per 1000 gallons of system water to achieve control. To maintain control add sufficient Justeq07 to maintain 2.0-4.0 ppm total chlorine throughout the system. (Two fluid ounces per 1000 gallons of water yields 1.0 ppm total chlorine).

AIR WASHERS (This product may be used only in industrial air washers and air washer systems which have mist-eliminating components.)

For control of microorganisms in industrial air washer systems add sufficient Justeq07 to the air washer sump or chill water to provide a total chlorine level of 2.0-4.0 ppm. Badly fouled systems must be cleaned before treatment is begun. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.0 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.0 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained at the bleed-off point. Some systems may be maintained in satisfactory biological condition by applying this dosage once per day while others will respond better to dosages less than once per day.

HEAT TRANSFER SYSTEMS (Such as Evaporative Condensers, Hydrostatic Sterilizers and Retorts, Dairy Sweetwater Systems, and Once-Through Cooling Water Systems)

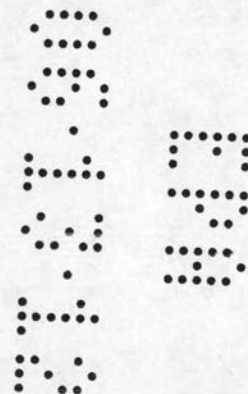
Justeq07 must be used at the same application rates, and in the same manner as described above. It must be added to the system at a point of uniform mixing such as a basin area, sump area, or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

PULP & PAPER MILL INFLUENT WATER SYSTEMS (not for use in California)

Justeq07 must be applied to the raw water intake prior to the filter house, economizer, or process water. Feed at a dosage sufficient to provide total a chlorine level of 2.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.0 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.0 ppm throughout the system. The total chlorine level must be checked with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained. Some systems can be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. Justeq07 can be used in pulp and paper influent water systems where the manufactured paper or paperboard can be used for food contact purposes.

PULP & PAPER MILL PROCESS WATER SYSTEMS (not for use in California)

Add Justeq07 to paper making systems at a point of uniform mixing such as the beaters, broke chest pump, save-all tank, or white water tank. Feed at a dosage sufficient to provide a total chlorine level of 2.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.0 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.0 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained. Some systems can be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. Justeq07 can be used in pulp and paper mill process water systems where the manufactured paper or paperboard can be used for food contact purposes.



STORAGE AND DISPOSAL

Do not contaminate water, food, feed by storage and disposal.

PESTICIDE STORAGE: Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. **Nonrefillable container. Do not refill this container.**

PESTICIDE DISPOSAL: Pesticide disposal wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or place in trash collection.

FOR RIGID NON-REFILLABLE CONTAINERS – 5 gallons or less:

Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

FOR RIGID NON-REFILLABLE CONTAINERS – greater than 5 gallons:


Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container to its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

WARRANTY STATEMENT

Justeq LLC warrants that this product complies with the specifications expressed on the label. To the extent consistent with applicable law, Justeq LLC makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose.

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
	Application for Pesticide – Section 1		

1. Company/Product Number 84024-1	2. EPA Product Manager Monisha Harris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Justeq07	PM# 32	
5. Name And Address Of Applicant (Include ZIP Code) Justeq, LLC 2871 Crimson Ct. Northbrook, IL 60062 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain Below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Fast Track amendment for Justeq07 (EPA Reg. No. 84024-1) per changes requested by State of California Department of Pesticide Regulation.

Section III

1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Unit Packaging wgt. No. per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container 5, 15, 30, 55 and 275 gallon	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Robert M. Sielaty		Title Authorized Representative for Justeq, LLC	
		Telephone No. (Include Area Code) (703) 754-0248	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received
2. Signature 		3. Title Authorized Representative for Justeq, LLC	
4. Typed Name Robert M. Sielaty		5. Date June 12, 2012	

toXcel

Toxicology & Regulatory Affairs
Gainesville, VA 20156
USA

Phone: (703) 754-0248

Fax: (703) 310-6950

HAND DELIVER

June 12, 2012

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

ATTENTION: Monisha Harris / PM-32

RE: Fast Track amendment to "Justeq07" (EPA Reg. No. 84024-1)

Dear Ms. Harris:

On behalf of Justeq LLC, of Northbrook, Illinois, we are submitting an amendment to the stamped-accepted label dated August 27, 2010 for "Justeq07" (EPA Reg. No. 84024-1) that includes changes to comply with requests by the State of California Department of Pesticide Regulation (CDPR) to improve its clarity and enforceability, per their decision to register the product dated May 24, 2012.

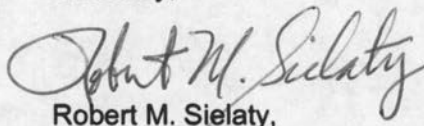
The label changes are: 1) clarification that 2-ounces of subject product per 1,000-gallon of water use rate (1:64,000 dilution rate) results in 1.0 ppm total available chlorine; 2) the phrase "not for use in California" now applies to Pulp and paper mill process water systems, Pulp and paper mill influent water systems, and Shell egg pasteurizer water systems; 3) addition of a warranty statement.

The following documents are enclosed:

- 1) Application for Registration (EPA Form 8570-1)
- 2) One highlighted copy of the proposed amended label
- 3) Five (5) clean copies of the proposed amended label (dated June 12, 2012)
- 4) Certification with Respect to Label Integrity

This action qualifies as a fast-track amendment not subject to PRIA, because it does not involve review of any data. If you have any questions, please do not hesitate to contact me at Robert.Sielaty@toxcel.com or (703) 754-0248 X 118.

Sincerely,



Robert M. Sielaty,

Enclosures

cc: S. Shim, Justeq LLC



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product 84024-1	Distributor Company Number 63367
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Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA) Justeq07	Distributor Product Name B-307
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Name and Address of Distributor (Type; include ZIP code)

CHEMICO International, Inc.
 19407 Park Row, No. 218
 Houston, TX 77084

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Genice D. Adams V.P.

Date

5-23-2011

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

SR President.

Date

5/24/11

Bm



United States
Environmental Protection Agency

Office of Pesticide Programs (7505C)
Washington, DC 20460

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This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024-1 11B 3.1

Distributor Company Number

11731-MO-001

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
Justeq 07

Distributor Product Name
American #818 Industrial Microbiocide

Name and Address of Distributor (Type; include ZIP code)

American Water Treatment, Inc.
6324 Bartmer Ave
St. Louis, MO

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Date

[Signature]

1/25/11

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Date

[Signature] Manager.

1/27/11


Environmental Protection Agency

 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product
Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024-1

11B 3.1

Distributor Company Number

049294-FL-001

049294

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Distributor Product Name

Justeq07

Justeq07

Name and Address of Distributor (Type; include ZIP code)

 R2J Chemical Services, Inc.
 12345-D 62nd Street North
 Largo, FL 33773

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

President

Date

1-25-11

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Manager

Date

2/1/11



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

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If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024-1

11B-3.1

Distributor Company Number

40899

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Justeq07

Distributor Product Name

Justeq07

Name and Address of Distributor (Type; include ZIP code)

PACIFIC STANDARD SPECIALTIES, INC.

PO Box 2796
 Glendale, AZ 85502

Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

[Signature] President

Date

7-27-2010

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

[Signature] Manager

Date

7-30-2010

2 A4-3

Print Form

Read All Instructions Before Completing this Form (Form must be typed) Form Approved. OMB No. 2070-0044. Approval Expires 1-31-00



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product
84024-1

Distributor Company Number
46899

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
Justeq07

Distributor Product Name
Justeq07

Name and Address of Distributor (Type; include ZIP code)

PACIFIC STANDARD SPECIALTIES, INC.
14205 S. AZ HWY 188
GLOBE, AZ 85501
(928) 425-3217

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Date

Richard M. Chappin President

7-27-2010

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Date

Sam S. ... President

7/30/2010

Material to be added to an e-Jacket/Jacket

Reg. No. 84024-1

1. ☐ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top/newest)
 - ☐ Description: (PDF page number, i.e., "before page 45")
-
-

2. ☒ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☒ Notification
- ☐ New CSF
- ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: David Liem

Phone: _____ Division: AD

Date: 8/27/2010

Created July 21/200

RISK ASSIGNMENT FORM
Antimicrobial Division/Regulatory Management Branch II

A	Completed by Product Manager						
PRODUCT REVIEWER: David Liem					RMBII <u>TEAM 32</u>		
Type of Action: NOTIFICATION					EPA File Symbol/Reg No. 84024-1		
Decision No. <u>438085</u>		Submission No. <u>879782</u>		Fee for Service Action Code:			
FQPA Action Code: 332		Non-FQPA Action Code:		PRIA FEE AMOUNT:			
	MONTH	DAY	YEAR				
APPLICATION DATE	07	26	2010				
EPA PIN DATE	07	27	2010				
DATE PM RECEIVED FROM FRONT END	07	29	2010				
DATE SENT TO SCIENCE <small>[VIVIAN COMPLETES]</small>							
DATE RECEIVED FROM SCIENCE							
DATE DUE TO PM	08	25	2010				
Type of Data:	PSB Product Chemistry	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure/ Residue
Update Storage and Disposal							
ATTACHMENTS: -LABELING -CSF(S) -DATA -OTHERS							
B	For Arctic Slope Contract Only						
	Contract No.: 0052		ARCTIC SLOPE/MANAGER				
	Final Task: Signature _____ (Total hrs)						
C	Reviewer Comments:						
DATE FEE PAID:				RESPONSE CODE: <u>1165</u> RESPONSE DATE: <u>8/27/2010</u>			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 27, 2010

FILE COPY

Robert M. Sielaty
TOXCEL, Toxicology & Regulatory Affairs
P.O. Box 363, 7140 Heritage Village Plaza,
Gainesville, VA 20156

Subject: JUSTEQ07
EPA Reg.#: 84024-1
Notification Date: July 26, 2010 (Revised Form 8570-1 dated August 10, 2010)
Receipt Date: July 29, 2010

Dear Mr. Sielaty:

This acknowledges the receipt of your notification, submitted under the provision of PR Notice 98-10 and FIFRA section 3(c)9.

Proposed Notification:

Revised Storage and Disposal Statement in compliance with PR Notice 2007-4 for JUSTEQ07 (EPA Reg# 84024-1).

General Comment:

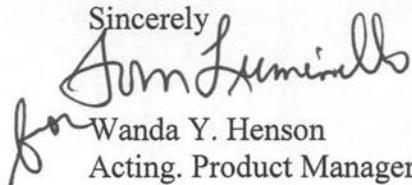
Based on the review of the material submitted, the following comments apply:

1. Insert a general statement "**Do not contaminate water, food, feed by storage and disposal**", immediately after the "**STORAGE AND DISPOSAL**" heading.
2. Within the "**PESTICIDE STORAGE**" subheading, delete "**Do not contaminate water, or feed by storage...**" statements.
3. Within the "**PESTICIDE STORAGE**" subheading, move the statement "**Offer for recycling if available or place in trash collection.**" into the "**CONTAINER HANDLING**" subheading immediately after "**Do not reuse or refill this container**" sentence.

This notification and a copy of this letter have been inserted in your file for future reference."

If you have any questions on this letter, please contact David Liem at 703-305-1284 or by email at liem.david@epa.gov

Sincerely

A handwritten signature in cursive script, appearing to read "Wanda Y. Henson".

for Wanda Y. Henson
Acting. Product Manager (32)
Regulatory Management Branch II
Antimicrobial Division (7510P)

Y903 3



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide – Section 1

1. Company/Product Number 84024-1	2. EPA Product Manager W. Henson	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Justeq07	PM# 34	
5. Name And Address Of Applicant (Include ZIP Code) Justeq, LLC 2536 Whitehall Lane Naperville, IL 60564 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain Below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4 for "Justeq07". This notification is consistent with the guidance of PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§152.10, 156.140, 156.144, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§152.10, 156.140, 156.144, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section III

1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Unit Packaging wgt. No. per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container 5, 15, 30, 55 and 275 gallon	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Robert M. Sielaty	Title Authorized Representative	Telephone No. (Include Area Code) (703) 754-0248
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		Date Application Received
2. Signature 	3. Title Authorized Representative	
4. Typed Name Robert M. Sielaty	5. Date July 26, 2010	

toXcel

Toxicology & Regulatory Affairs

P.O. Box 363

7140 Heritage Village Plaza

Gainesville, VA 20156

USA

Phone: (703) 754-0248

Fax: (703) 310-6950

HAND-DELIVER

July 26, 2010

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

RE: Notification of Revised Storage and Disposal Statements in Compliance
with PR Notice 2007-4 for *Justeq07*
EPA Reg. No. 84024-1

Dear Sir/Madam:

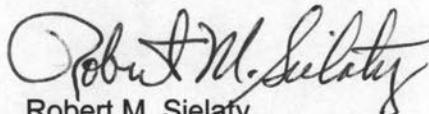
On behalf of Justeq LLC, Illinois, we are notifying the Agency of label revisions to the storage and disposal section which strictly adopts the exact wording required by Pesticide Registration (PR) Notice 2007-4. No other changes have been made to the label, which was previously approved on 10/18/2007.

The following documents are enclosed:

- 1) EPA Form 8570-1
- 2) One copy of the revised label with modifications marked
- 3) One clean copy of the revised label

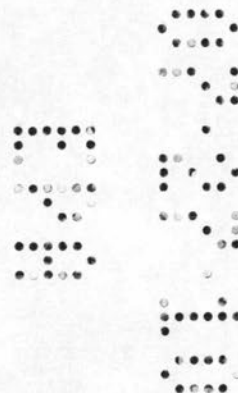
We request that you please send us a stamped-accepted label to be used for state registration. Please contact me immediately if you have any questions regarding this notification at Robert.Sielaty@toxcel.com.

Sincerely,



Robert M. Sielaty
Authorized Representative for Justeq07

cc: S. Shim, Justeq LLC



Justeq07

Justeq07 is an effective agent for controlling algae, bacteria, and fungi that produce slime in recirculating condensing and cooling equipment and in reservoirs or ponds that serve as the source of boiler feedwater or cooling water. Justeq07 can also be used to control bacteria, algae and fungal slime in decorative fountains, air washers, paper mill water systems, and food, beverage, and industrial process pasteurizers.

ACTIVE INGREDIENTS:

Sodium hypochlorite..... 7.00%

Sodium bromide 1.50%

INERT INGREDIENTS 91.50%

Total 100.00%

Total Available chlorine = approximately 6.7%

Total Available Bromine = approximately 2.3%

NOTIFICATION
Date Reviewed: 8/27/2010
Reviewed By: *[Signature]*

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID

If in eyes:

- ◉ Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- ◉ Remove contact lenses if present after the first 5 minutes, then continue rinsing eye.
- ◉ Call a poison control center or a doctor for treatment advice.

If on skin or clothing:

- ◉ Take off contaminated clothing.
- ◉ Rinse skin immediately with plenty of water for 15-20 minutes.
- ◉ Call a poison control center or a doctor for treatment advice.

If inhaled:

- ◉ Move person to fresh air.
- ◉ If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible.
- ◉ Call a poison control center or a doctor for further treatment advice.

If swallowed:

- ◉ Call a poison control center or a doctor immediately for treatment advice.
- ◉ DO NOT INDUCE VOMITING, unless told to do so by the Poison Control Center or Doctor.
- ◉ Do not give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN:

Aspiration may cause lung damage. Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container, label or MSDS with you when calling a poison control center or a doctor, or going for treatment. In case of Medical Emergency, call (630) 428-4143.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 84024 - 1

EPA Est. No.: 6484-WI-001

Net Contents _____

JUSTEQ LLC
2871 Crimson Ct.
Northbrook, IL 60062

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. CAUSES SKIN BURNS.

Do not get in eyes, on skin or on clothing. Wear protective goggles, face shield, safety glasses, and chemical-resistant gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board Regional Office of EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

COOLING PONDS, RESERVOIRS AND DECORATIVE FOUNTAINS

Justeq07 must be applied at the reservoir, pond, or fountain inlet or at a location that permits complete diffusion into the water at maximum retention time before reaching the outlet. Sufficient Justeq07 must be fed to maintain a total chlorine level of 1.0-4.0 ppm in all parts of the reservoir or pond (two fluid ounces per 1000 gallons of water yields about 1.4 ppm total chlorine).

INDUSTRIAL & COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS

Justeq07 must be applied directly to the cooling water at any section of the system where sufficient mixing will occur. Apply Justeq07 to the cooling water to provide a total chlorine level of 1.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the systems. Check the total chlorine level with a test kit and additional product applied until a reading of 1.0-4.0 ppm is obtained at the bleed-off point. The product can be added to the system either continuously or intermittently or as needed to obtain the above residual. The frequency of feeding and dosage rate will depend upon the severity of the problem.

INDUSTRIAL PASTEURIZERS (Such as food, beverage, and industrial process pasteurizers)

For control of bacteria and fungi in industrial pasteurizers add 4-8 ounces of Justeq07 per 1000 gallons of system water to achieve control. To maintain control add sufficient Justeq07 to maintain 2.0-4.0 ppm total chlorine throughout the system. (Two fluid ounces per 1000 gallons of water yields 1.4 ppm total chlorine.)

SHELL EGG PASTEURIZER WATER SYSTEMS

For control of bacteria, fungi and algal slime in shell egg pasteurizer water systems add 4-8 ounces of Justeq07 per 1000 gallons of system water to achieve control. To maintain control add sufficient Justeq07 to maintain 2.0-4.0 ppm total chlorine throughout the system. (Two fluid ounces per 1000 gallons of water yields 1.4 ppm total chlorine)

AIR WASHERS (This product may be used only in industrial air washers and air washer systems which have mist-eliminating components.)

For control of microorganisms in industrial air washer systems add sufficient Justeq07 to the air washer sump or chill water to provide a total chlorine level of 2.0-4.0 ppm. Badly fouled systems must be cleaned before treatment is begun. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained at the bleed-off point. Some systems may be maintained in satisfactory biological condition by applying this dosage once per day while others will respond better to dosages less than once per day.

HEAT TRANSFER SYSTEMS (Such as Evaporative Condensers, Hydrostatic Sterilizers and Retorts, Dairy Sweetwater Systems, and Once-Through Cooling Water Systems)

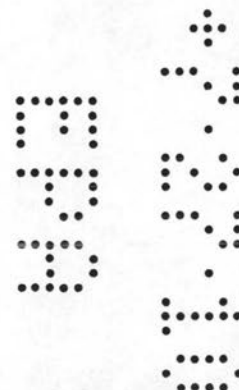
Justeq07 must be used at the same application rates, and in the same manner as described above. It must be added to the system at a point of uniform mixing such as a basin area, sump area, or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

PULP & PAPER MILL INFLUENT WATER SYSTEMS

Justeq07 must be applied to the raw water intake prior to the filter house, economizer, or process water. Feed at a dosage sufficient to provide total a chlorine level of 2.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. The total chlorine level must be checked with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained. Some systems can be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. Justeq07 can be used in pulp and paper influent water systems where the manufactured paper or paperboard can be used for food contact purposes.

PULP & PAPER MILL PROCESS WATER SYSTEMS

Add Justeq07 to paper making systems at a point of uniform mixing such as the beaters, broke chest pump, save-all tank, or white water tank. Feed at a dosage sufficient to provide a total chlorine level of 2.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained. Some systems can be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. Justeq07 can be used in pulp and paper mill process water systems where the manufactured paper or paperboard can be used for food contact purposes.



STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used must be diluted with water before disposal in a sanitary sewer. **Nonrefillable container. Do not refill this container. Offer for recycling if available or place in trash collection.** Do not contaminate water, or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Pesticide disposal wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: **Nonrefillable container. Do not reuse or refill this container**

FOR RIGID NON-REFILLABLE CONTAINERS – 5 gallons or less:

Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

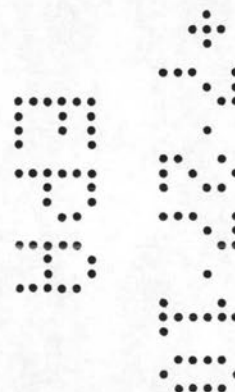
Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

FOR RIGID NON-REFILLABLE CONTAINERS – greater than 5 gallons:

Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container to its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.



REVISED VERSION

Please read instructions on reverse side before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98

		United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other		OPP Identifier Number _____	
Application for Pesticide – Section I							
1. Company/Product Number <div style="text-align: center; font-weight: bold;">84024-1</div>			2. EPA Product Manager <div style="text-align: center; font-weight: bold;">W. Henson</div>		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted		
4. Company/Product (Name) <div style="text-align: center; font-weight: bold;">Justeq07</div>			PM# <div style="text-align: center; font-weight: bold;">34</div>				
5. Name And Address Of Applicant (Include ZIP Code) <div style="text-align: center;"> Justeq, LLC 2536 Whitehall Lane Naperville, IL 60564 </div> <input type="checkbox"/> Check if this is a new address			6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____				
Section II							
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.				<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain Below.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Notification of label change per PR Notice 2007-4 for "Justeq07". This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§156.10, 156.140, 156.144, 156.146 and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§156.10, 156.140, 156.144, 156.146 and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.							
Section III							
1. Material This Product Will Be Packaged In:							
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No		Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" No. per Unit Packaging wgt. Container		If "Yes" No. per Unit Packaging wgt. Container			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container			4. Size(S) Retail Container <div style="text-align: center; font-weight: bold;">5, 15, 30, 55 and 275 gallon</div>			5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____				
Section IV							
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)							
Name <div style="text-align: center; font-weight: bold;">Robert M. Sielaty</div>			Title <div style="text-align: center; font-weight: bold;">Authorized Representative</div>			Telephone No. (Include Area Code) <div style="text-align: center; font-weight: bold;">(703) 754-0248</div>	
Certification						6. Date Application Received	
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.							
2. Signature 			3. Title <div style="text-align: center; font-weight: bold;">Authorized Representative</div>				
4. Typed Name <div style="text-align: center; font-weight: bold;">Robert M. Sielaty</div>			5. Date <div style="text-align: center; font-weight: bold;">August 10, 2010</div>				

ppm

741-3

Print Form

Please Read All Instructions Before Completing Form (Form must be typed) Form Approved. G

2070-0044. Approval Expires 1-1-80



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product.

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product 84024-1	Distributor Company Number 15300
--	--

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA) Justeq07	Distributor Product Name CHEMTREAT CL-4917
--	--

Name and Address of Distributor (Type; include ZIP code) CHEMTREAT, INC. 4461 Cox Rd. Glen Allen, Va. 23060

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor [Signature] Manager, SHERA	Date 4/30/10
---	------------------------

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant [Signature] President.	Date 5/4/10
--	-----------------------



Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460
United States



Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

After a registrant has obtained final registration for the basic product, the registrant may then supplementarily distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

EPA Registration Number of Product

Distributor Company Number

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Distributor Product Name

Name and Address of Distributor (Type; include ZIP code)

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Date

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Date

7A1-3

Print Form

Please Read All Instructions Before Completing this Form (Form must be typed) Form Approved. OMB No. 2070-0044. Approval Expires 1-31-99



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product 84024-1	Distributor Company Number 9250
--	---

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA) Justeq07	Distributor Product Name UNITED 339 CYCLE SMART STABILIZED BROMINE TREATMENT
--	--

Name and Address of Distributor (Type; include ZIP code)

**UNITED LABORATORIES, INC.
 320 37th AVENUE
 ST. CHARLES, IL 60174**

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
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6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

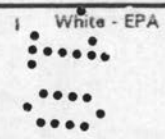
We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor Sandra Kopacz - Specialist	Regulatory Affairs Regulatory Affairs	Date April 5, 2010
---	---	------------------------------

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant President.	Date 4/6/10
--	-----------------------





United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

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If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product 84024-1	Distributor Company Number 64216
---	-------------------------------------

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA) Justeq07	Distributor Product Name CESCO ACT 2020
---	--

Name and Address of Distributor (Type; include ZIP code)

CESCO SOLUTIONS, INC.
3715 IRONGATE ROAD
BELLINGHAM, WA 98226

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Nancy E. Ryder Nancy Ryder, Regulatory Affairs Director

Date

12/16/09

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

John Smith President

Date

12/21/09

7A 1-3

Print Form

Please Read All Instructions Before Completing this Form (Form must be typed) Form Approved. OMB No. 2070-0044. Approval Expires 1-31-99



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product
84024-1

Distributor Company Number
67397

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
Justeq07

Distributor Product Name
AQ4113

Name and Address of Distributor (Type; include ZIP code)

Aqualine Water Treatment Products Inc.
710 Northeast Drive Suite 10
Davidson, NC 28036

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
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5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

[Handwritten Signature]

Date

8/30/09

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

[Handwritten Signature] Manager

Date

8/11/09

Print Form

Please Read All Instructions Before Completing this Form (Form must be typed) Form Approved. OMB No. 2070-0044. Approval Expires 1-31-05



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

7A 1-3

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

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This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024-1

Distributor Company Number

073713

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Justego 7

Distributor Product Name

QWT 2133

Name and Address of Distributor (Type; include ZIP code)

Quality Water Treatment, Inc.
401 Withers Avenue
St. Louis, MO 63147

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

John Haynes, Plant Manager

Date

9-18-2009

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Sgt. Sr. President

Date

9/18/09


 United States
Environmental Protection Agency

 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product
Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

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This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024 - 1

Distributor Company Number

41368

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Justeq07

Distributor Product Name

7407

Name and Address of Distributor (Type; include ZIP code)

 Power Engineering Company, Inc.
 364 West 600 North
 Salt Lake City, Utah 84103

 OK
 MY

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Robert A. Zuehlrow - Technical Director

Date

Sept 3, 2009

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Sgt. Smith - President

Date

9/1/09

MATERIAL TO BE ADDED TO JACKET

REG #

84024-1

12 A 11

Description:

Product Chemistry

data

check all that apply

<input type="checkbox"/>	new stamped accepted label	Send to CSC
<input type="checkbox"/>	new CSF	
<input type="checkbox"/>	notification	

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's
Name:

Tom Luminello

Date: JUL 07 2009

Phone:

308-8075

Division:

AD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

JUL 07 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Robert M. Sielaty, Agent for Justeq, LLC
c/o Toxcel LLC
P.O. Box 363, 7140 Heritage Village Plaza
Gainesville, VA. 20156

RE: Product Chemistry submission March 24, 2009
Product Name: Justeq07
EPA Registration Number: 84024-1

Dear Mr. Sielaty:

The Agency has reviewed the Storage Stability and Corrosion Characteristics data submitted in accordance with registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended, and determined the action acceptable

MRID 477106-01 concludes that concentrations of the product are consistent with label declarations over the presumed shelf life of the product. In accordance with the Label Review Manual, please add the available bromine concentration of 2.3% to the label.

A copy of our review is enclosed. If you have questions concerning this letter, please contact Tom Luminello of my staff at (703) 308-8075.

Sincerely,

Emily Mitchell
Emily H. Mitchell

Product Manager 32
Antimicrobials Division (7510-P)

Enclosure D 344637



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES
AND TOXIC
SUBSTANCES

June 26, 2009

DP BARCODE: D363985

MRID: 47710601

SUBJECT: Justeq07

REG. NO. OR FILE SYMBOL: 84024-1

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use ☐ OR End-use Product ☒

INGREDIENTS (PC Codes): 014703, 013907

CAS Number: 7681-52-9, 7647-15-6

TEST LAB: Eurofins| Product Safety Labs

SUBMITTER: Justeq, LLC.

GUIDELINE: 830.6317 and 830.6320

COMMODITIES: Formulation

REVIEWER: Chris Jiang CJ

ORGANIZATION: AD

APPROVER: Karen P. Hicks

APPROVED DATE: 6/26/09

COMMENT:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES
AND TOXIC
SUBSTANCES

June 26, 2009

MEMORANDUM

Subject: Justeq07

From: Chris Jiang, Chemist
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Chris Jiang

Thru: Karen P. Hicks, CT Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

*Chris Jiang
for KPH 6/26/09*

Thru: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510P)

To: Emily Mitchell PM 32\Thomas Luminello, Jr.
Regulatory Management Branch II
Antimicrobials Division (7510P)

Applicant: Justeq, LLC.

Formulation from Label

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
Sodium hypochlorite	7.00 %
Sodium bromide	1.50 %
<u>Inert Ingredients</u>	91.50 %
Total	100.00 %
Total available chlorine = approximately 6.7 %	

BACKGROUND:


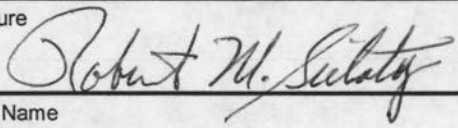
The registrant has submitted a label, a Confidential Statement of Formula, and a joint study for storage stability and corrosion characteristics (MRID 47710601) for this end-use product. The contractor has conducted a primary review of this submission and Product Science Branch of Antimicrobials Division has conducted a secondary review which supersedes the primary review.

FINDINGS:

1. The concentrations of the active ingredients on the Confidential Statement of Formula (CSF dated July 9, 2007) are consistent with the label declaration.
2. The joint study for storage stability and corrosion characteristics is **acceptable**. The respective average percentages of sodium hypochlorite were 6.9, 6.7, 6.8, 6.7, 6.6, and 6.6 at the initial observation, after 2 months, after 3 months, after 6 months, after 9 months, and after 12 months. The respective average percentages of sodium bromide were 1.4, 1.5, 1.5, 1.3, 1.3, and 1.4 at the initial observation, after 2 months, after 3 months, after 6 months, after 9 months, and after 12 months. The product was not observed to cause corrosion (cracking, pitting, or discoloration) to the low density polyethylene (LDPE) containers. Due to an oversight, the containers were not observed for corrosion after 2 months, after 3 months, and after 6 months. At study initiation, the product was a pale yellow liquid. At study termination, the product was a pale yellow liquid.
3. The available bromine must be declared on the label as 2.3%.

CONCLUSIONS:

Product Science Branch of Antimicrobials Division finds the submission for 84024-1 to be acceptable, pending the label change which can be done on the next printing of the label.

 <div style="margin-left: 20px;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section 1			
1. Company/Product Number Justeq, LLC/EPA Reg. No. 84024-1		2. EPA Product Manager Emily Mitchell	
4. Company/Product (Name) Justeq, LLC/Justeq07		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name And Address Of Applicant (Include ZIP Code) Justeq, LLC 2536 Whitehall Lane Naperville, IL 60564 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name	
Section II			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification – Explain below. <input checked="" type="checkbox"/> Other – Explain Below.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) In response to the October 18, 2007 stamped approved label, the registrant is submitting the combined one-year Storage Stability and Corrosion Characteristics study in support of the conditional registration of Justeq07.			
Section III			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Other _____ <input type="checkbox"/> Stenciled			
Section IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Robert M. Sielaty		Title Authorized Representative	
		Telephone No. (Include Area Code) (703) 335-5670	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received
2. Signature 		3. Title Authorized Representative	
4. Typed Name Robert M. Sielaty		5. Date March 24, 2009	

DATA PACKAGE BEAN SHEET

Date: 13-Apr-2009

Page 1 of 2

Decision #: 408676

DP #: (363985)

NON PRIA

Parent DP #:

Submission #: 847214

FQPA

*** Registration Information ***

Registration: 84024-1 - JUSTEQ07

Company: 84024 - JUSTEQ, LLC

Risk Manager: RM 32 - Robert Brennis - (703) 308-6264 Room# CM-2 308G

Risk Manager Reviewer: Thomas Luminello, Jr. TLUMINEL

Sent Date: 25-Mar-2009

Calculated Due Date: 13-Jul-2009

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (575) CONDITIONAL REGISTRATION FOLLOW-UP;DATA REQUIRED;REQUIRES SCIENCE

Ingredients: 013907, Sodium bromide(1.5%)

014703, Sodium hypochlorite(7%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 13-Apr-2009

Due Back: _____

DP Ingredient: 013907, Sodium bromide

014703, Sodium hypochlorite

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

120
90

Assigned To

Date In

Date Out

Organization: AD / PSB

Team Name: CTT

Reviewer Name:

Contractor Name:

4/14/09

4/14/09

4/15/09

4/15/09

Last Possible Science Due Date: 04-May-2009

Science Due Date: 6/29/09

Sub Data Package Due Date: 7/13/09

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Product Chemistry: Please review the attached cover letter and study (MRID# 477106-01) submitted as requested by Agency.

✓ please do cont/bean (2 each)

1. add KRIS

2. Give to KRIS to add CSF and label (THEN KRIS GIVE BACK TO VERONICA ASAP).

3. CSC

4. Wallace will set date TY!

RECEIVED
4/14/09

40

DATA PACKAGE BEAN SHEET

Date: 13-Apr-2009

Page 1 of 2

Decision #: 408676

DP #: (363985)

NON PRIA

Parent DP #:

Submission #: 847214

*** Registration Information ***

Registration: 84024-1 - JUSTEQ07

Company: 84024 - JUSTEQ, LLC

Risk Manager: RM 32 - Robert Brennis - (703) 308-6264 Room# CM-2 308G

Risk Manager Reviewer: Thomas Luminello, Jr. TLUMINEL

Sent Date: 25-Mar-2009

Calculated Due Date: 13-Jul-2009

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (575) CONDITIONAL REGISTRATION FOLLOW-UP; DATA REQUIRED; REQUIRES SCIENCE

Ingredients: 013907, Sodium bromide(1.5%)

014703, Sodium hypochlorite(7%)

COPY FOR YOUR
INFORMATION

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 13-Apr-2009

Due Back: _____

DP Ingredient: 013907, Sodium bromide

014703, Sodium hypochlorite

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

Last Possible Science Due Date: 04-May-2009

Team Name: CTT

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Product Chemistry: Please review the attached cover letter and study (MRID# 477106-01) submitted as requested by Agency.

Krishna has

MAY 26 2009

DATA PACKAGE BEAN SHEET

Date: 13-Apr-2009

Page 1 of 2

Decision #: 408676

DP #: (363985)

NON PRIA

Parent DP #:

Submission #: 847214

*** Registration Information ***

Registration: 84024-1 - JUSTEQ07

Company: 84024 - JUSTEQ, LLC

Risk Manager: RM 32 - Robert Brennis - (703) 308-6264 Room# CM-2 308G

Risk Manager Reviewer: Thomas Luminello, Jr. TLUMINEL

Sent Date: 25-Mar-2009

Calculated Due Date: 13-Jul-2009

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (575) CONDITIONAL REGISTRATION FOLLOW-UP;DATA REQUIRED;REQUIRES SCIENCE

Ingredients: 013907, Sodium bromide(1.5%)

014703, Sodium hypochlorite(7%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 13-Apr-2009

Due Back: _____

DP Ingredient: 013907, Sodium bromide

014703, Sodium hypochlorite

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

Last Possible Science Due Date: 04-May-2009

Team Name: CTT

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***


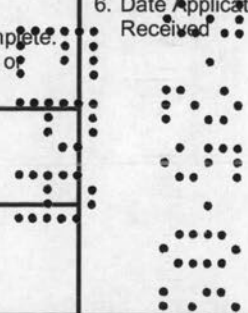
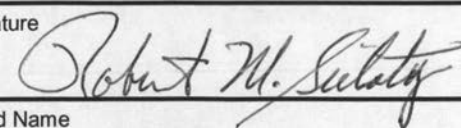
No Additional Data Packages

*** Data Package Instructions ***

Product Chemistry: Please review the attached cover letter and study (MRID# 477106-01) submitted as requested by Agency.

RISK ASSIGNMENT FORM
Antimicrobial Division/Regulatory Management Branch II

A	Completed by Product Manager						
PRODUCT REVIEWER: Tom Luminello						RMBII TEAM <u>32</u>	
Description of Action: Amendment						EPA File Symbol/Reg No. 84024-1	
Decision No. <u>408676</u> <u>595</u>		Submission No. <u>847214</u>		Fee for Service Action Code:			
FQPA Action Code: <u>302</u>		Non-FQPA Action Code:		PRIA FEE AMOUNT:			
	DAY	MONTH	YEAR				
APPLICATION DATE	24	03	2009				
EPA PIN DATE	25	03	2009				
DATE PM RECEIVED FROM FRONT END	01	04	2009				
DATE SENT TO SCIENCE <small>[VIVIAN COMPLETES]</small>							
DATE RECEIVED FROM SCIENCE							
DATE DUE TO PM							
Type of Data:	PSB Product Chemistry X	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure/Residue
COMMENTS: Storage Stability and Corrosion Characteristics Data							
ATTACHMENTS: <input type="checkbox"/> -LABELING <input type="checkbox"/> -CSF(S) <input type="checkbox"/> -DATA <input type="checkbox"/> -OTHERS							
B	For Arctic Slope Contract Only						
	Contract No.: 0052		ARCTIC SLOPE/MANAGER				
	Final Task: Signature _____ (Total hrs)						
C	Reviewer Comments:						
DATE FEE PAID:				RESPONSE CODE:		RESPONSE DATE:	

 <div style="margin-left: 20px;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section 1			
1. Company/Product Number Justeq, LLC/EPA Reg. No. 84024-1		2. EPA Product Manager Emily Mitchell	
4. Company/Product (Name) Justeq, LLC/Justeq07		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name And Address Of Applicant (Include ZIP Code) Justeq, LLC 2536 Whitehall Lane Naperville, IL 60564 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name	
Section II			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification – Explain below. <input checked="" type="checkbox"/> Other – Explain Below.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) In response to the October 18, 2007 stamped approved label, the registrant is submitting the combined one-year Storage Stability and Corrosion Characteristics study in support of the conditional registration of Justeq07.			
Section III			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container	
		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	
Section IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Robert M. Sielaty		Title Authorized Representative Telephone No. (Include Area Code) (703) 335-5670	
Certification		6. Date Application Received	
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
2. Signature 			
3. Title Authorized Representative			
4. Typed Name Robert M. Sielaty		5. Date March 24, 2009	

Memorandum

Date: 3 / 31 / 09

To: PM 32, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 27, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

TOXCEL LLC
JUSTEQ, LLC
7140 HERITAGE VILLAGE PLAZA, PO Box 363
GAINESVILLE, VA 20156-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 25-MAR-09. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: 847214

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Company: 84024 JUSTEQ, LLC

V

Risk Manager: Antimicrobials Division, Risk Management Team 32

Product #: 84024-1 Product Name: JUSTEQ07

Override#:

Me Too

Me Too

Section3:

Product Name:

Application Date: 24-Mar-2009

id

OPP Rec'd Date: 25-Mar-2009

id

Front End Date: 25-Mar-2009

id

Risk Manager Send Date: 25-Mar-2009

id

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

one-year storage stability & corrosion characteristics

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Study

View/Edit

New Ingredient

Request Date:

New Ingredient

Received Date:

toXcel**Toxicology & Regulatory Affairs**

P.O. Box 363

7140 Heritage Village Plaza

Gainesville, VA 20156

USA

Phone: (703) 335-5670

Fax: (703) 310-6950

HAND DELIVERED

March 24, 2009

Ms. Emily Mitchell (PM-32)
Antimicrobials Division (7510P)
Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

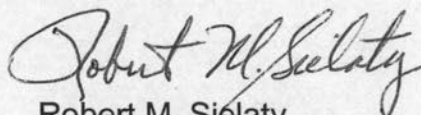
**RE: Submission of the One-Year Storage Stability and Corrosion
Characteristics Study for - Justeq07 (EPA Reg. No. 84024-1)**

Dear Ms. Mitchell:

On behalf of Justeq, LLC and in response to the conditional registration, we are submitting the one-year Storage Stability and Corrosion Characteristics Study for the above referenced product. This study fulfills data requirements EPA/OPPTS 830.6317 and 830.6320.

If you have any questions or require additional information, please contact me by email at rsielaty@toxcel.com or by phone at 703-335-5670. Thank you.

Sincerely,



Robert M. Sielaty
Authorized Representative

Enclosures

CC: S. Shim, Justeq LLC

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter (Registrant)

Justeq, LLC
2536 Whitehall Lane
Naperville, IL 60564
(EPA Company ID No. 84024)

Authorized Representative:
toXcel, LLC
7140 Heritage Village Plaza
Gainesville, VA 20155

2. Regulatory Action for which this Package is Submitted:

EPA Registration No. 84024-1 – Submission of data in support of the conditional registration of Justeq07 – one-year Storage Stability and Corrosion Characteristics Study

3. Transmittal Date

March 24, 2009

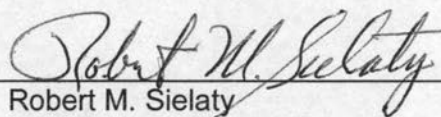
4. List of Submitted Documents

MRID	Storage Stability and Corrosion Characteristics: Final Report (2009).
47710601	Study number 21338. Unpublished study prepared by Product Safety Laboratories. 52p.

5. Company Contact

Company Name: JUSTEQ, LLC

Authorized Representative:



Robert M. Sielaty
toXcel, LLC
7140 Heritage Village Plaza
Gainesville, VA 20155
email: rsielaty@toxcel.com
Telephone: (703) 335-5670
FAX: (703) 310-6950

263
1-146

TASK ASSIGNMENT FORM (TAF)
Antimicrobials Division/OPP--Effective June 5, 1998

PO: Cletis Mixon

A -- Completed by Reviewer/Team Leader (check (X) or complete appropriate boxes)

RASSB__	PSB <u>X</u>	Product Acute Toxicology__	Human Toxicology__	Product Chemistry <u>X</u>	Efficacy__
---------	--------------	----------------------------	--------------------	----------------------------	------------

Chemical or EPA Reg. No.: 84024-1

DP Barcode: 363985

Type: Registration X RED__ Prod. Reregistration__ Special Project__ Lit. Search__ Other:__

Due Date: <u>5/14/09</u>	AD Contact: Wallace Powell	Reviewer: Krishna Deb	Team Leader: Tajah Blackburn__ Karen Hicks <u>X</u>
--------------------------	----------------------------	-----------------------	--

B -- Completed by Reviewer/Team Leader

C -- Completed By Contractor

Study/Action	MRID	GDLN #	Gov't Est Hrs	Tech Hrs. Spent
Storage Stability and Corrosion Characteristics	477106-01	830 Series		
		Total	2.2	3

Review Instructions/Comments:

AD RECORD CONTROL SHEET

Type / File Code: _____

General Information / Meta Data

Please enter any information that may be important when searching for this document or added to the file name. In addition to the date, choose at least one other search or sort data. For your convenience you can stack all like documents together and highlight the data categories to be completed later.

Document Date: _____

Document Title: _____

Topic / Issue / Subject Category: _____

Document Type / File Code: _____

Chemical Name: _____

PC Code: _____

DP Bar Code: 363985

Registration Number: _____

Other / Key Words: _____

Questions	Yes	No
<i>Please answer all questions below. See the Administrative Team for assistance.</i>		
Is it a Record?		
Is it Active? (See records schedule to make determination)		
Does it contain CBI?		
Is there already an electronic version?		
Is this the original?		
Is it a form letter?		
Is it in the Jacket?		
Do you need a copy returned to you?		

Comments:

Originator Name: _____

United States
Environmental Protection AgencyOffice of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024-1

Distributor Company Number

072968

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Justeq07

Distributor Product Name

JBC-22 Biocide

Name and Address of Distributor (Type; include ZIP code)

Jentek Water Treatment, Inc.
11524 Pagemill Road
Dallas, TX 75243

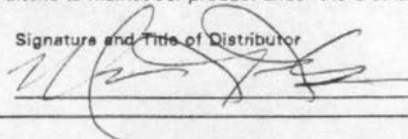
Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

 President

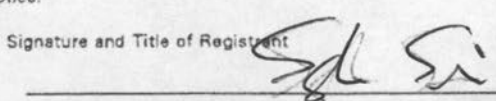
Date

6/18/09

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

 President

Date

6/18/09



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

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If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product
 84024-1

Distributor Company Number
 52675

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
 Justeq07

Distributor Product Name
 Waterchem 2030

Name and Address of Distributor (Type; include ZIP code)

Water Chemical Service
 1003 Old Philadelphia Road
 Aberdeen, Maryland 21001

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Paul E. Shambaugh Technical Director

Date

5-5-09

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Sal S. C. President

Date

5/4/09

United States
Environmental Protection AgencyOffice of Pesticide Programs (7505C)
Washington, DC 20460

186-1

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024-1

Distributor Company Number

74882

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Distributor Product Name

Justeq07

ML-719

Name and Address of Distributor (Type; include ZIP code)

Gehrke Technology Group
951 N. Old Rand Road Suite 112
Wauconda, IL 60084

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor.

Date

Edwards Well Jr. Manager.

4/3/09

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Date

Sh. Sh. President.

4/3/09


 United States
 Environmental Protection Agency

 Office of Pesticide Programs (7505C)
 Washington, DC 20460

9A4-2

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024-1

Distributor Company Number

1448

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Justeq07

Distributor Product Name

BUSAN 1735

Name and Address of Distributor (Type; include ZIP code)

 Buckman Laboratories, Inc.
 1256 N. McLean Blvd
 Memphis, TN 38108

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Carl Watson, Regulatory Toxicologist

Date

March 31, 2009

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Sung-Hea Shim, President

Date

4/1/09



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

9A4-2

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product 84024-1	Distributor Company Number 11659
Note: Do not submit distributor product labels	
Name of Registered Product (basic product name accepted by EPA) Justeq 07	Distributor Product Name Oxy-Brom
Name and Address of Distributor (Type; include ZIP code) Walling Water Management 2008 N. Westport Ave PO Box 5208 Sioux Falls, SD 57117-5208	

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Russ Haise, Technical Director

Date

2/16/09

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Sgt. Sr. President

Date

2/17/09



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product 84024-1	Distributor Company Number 44720
Note: Do not submit distributor product labels	
Name of Registered Product (basic product name accepted by EPA) Justeq07	Distributor Product Name Cite 8570
Name and Address of Distributor (Type; include ZIP code) Cite Corporation 710 5th Avenue Mansfield, TX 76063	

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Loy A. Waddell Loy A. Waddell

Date

12/15/2008

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

[Signature] President

Date

1/7/09

United States
Environmental Protection AgencyOffice of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product
84024-1Distributor Company Number
49396

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
Justeq07Distributor Product Name
A-207

Name and Address of Distributor (Type; include ZIP code)

Chemco Products, Inc.
1349 Grand Oaks Dr
Howell, MI 48843

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Manager

Date

11-17-08

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

President

Date

11/21/08



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

My Copy
9/A/4/2

July 17, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-381092
EPA File Symbol or Registration Number: 84024-R
Product Name: JUSTEQ07
EPA Receipt Date: 09-Jul-2007
EPA Company Number: 84024
Company Name: JUSTEQ, LLC

ROBERT M. SIELATY
TOXCEL LLC
JUSTEQ, LLC
7140 HERITAGE VILLAGE PLAZA, PO Box 363
GAINESVILLE, VA 20156-

SUBJECT: Receipt of Registration Application and 100% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your application for registration and 100% small business waiver request. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

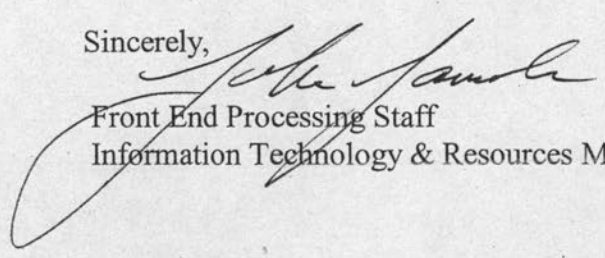
The Action has been identified as Action Code: A53

ME-TOO;NEW PRODUCT;FAST TRACK;

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If the determination indicates that payment is due, you will receive instructions for submitting payment at that time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman, at (703) 308-6432.

Sincerely,


Front End Processing Staff
Information Technology & Resources Management Division



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product
 84024-1-57365

Distributor Company Number
 57365

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
 Justeq07

Distributor Product Name
 MG-3610

Name and Address of Distributor (Type; include ZIP code)

Algoma Products Inc.
 4201 Brockton Drive SE
 Grand Rapids, MI 49512

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Date

[Signature] - VICE PRESIDENT

4-25-08

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Date

[Signature] President

4-29-08



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

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If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024-1

Distributor Company Number

56615

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Justeq07

Distributor Product Name

ALG-715

Name and Address of Distributor (Type; include ZIP code)

Aquatech, Water Treatment Div. of Entech Sales & Service, Inc.
1734 Hwy 66, Suite 200
Garland, TX 75040

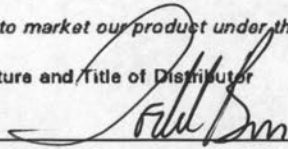
Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

 Todd Buss, Operations Manager

Date

4/9/08

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant



Date

4/15/08


 United States
 Environmental Protection Agency

 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024-1

Distributor Company Number

10332

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

JUSTEQ07

Distributor Product Name

AL-7015

Name and Address of Distributor (Type; include ZIP code)

 BARCLAY WATER MANAGEMENT, INC.
 150 COOLIDGE
 WATERTOWN, MA 02472

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

 T. M. Lam
 TAY-MING LAM
 VP/TECH. DIR.

Date

May 12, 2008

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

 S. A. Smith
 President

Date

5/16/08



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

232-3

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

8024-1 84024-01

Distributor Company Number

56567

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Justeq07

Distributor Product Name

CWT 2190

Name and Address of Distributor (Type; include ZIP code)

Geen Industries, Inc.
 P.O. Box 333
 Itasca, IL 60143

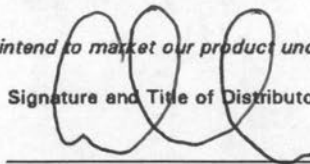
Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

 PRESIDENT

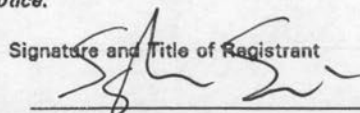
Date

3/19/08

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

 PRESIDENT

Date

3/17/08

2 B 2-3



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

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This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product 84024-1	Distributor Company Number 8637
---	------------------------------------

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA) Justeq07	Distributor Product Name MITCO CC-7L MICROBIOCIDIC
---	---

Name and Address of Distributor (Type; include ZIP code)
Mitco, Inc.
1601 Steele Avenue, S.W.
Grand Rapids, MI 49507

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

David A. VanDyke

David A. VanDyke, Ph.D.

Director of Regulatory Compliance

Date

2/27/2008

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

S. L. Smith

President

Date

2/27/08



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

282-3

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

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This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

84024-1

Distributor Company Number

71675

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Justez 07

Distributor Product Name

BIOTROL 409

Name and Address of Distributor (Type; include ZIP code)

US WATER SERVICES, INC.
 330 S. CLEVELAND ST.
 CAMBRIDGE, MN 55008

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
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7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

[Signature] Mgr Analytical Services

Date

2/18/08

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

[Signature] President

Date

2/21/08

Material to be added to a Mini-Jacket (in the case where an e-Jacket exists)

Reg. No. 84024-1

Send to SIG: check box

This material is:

New stamped-accepted label

New CSF

Notification

Final Printed Label

X Other: Status ~~up~~ report

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Lominello

Phone: 308-8075 Division: AD

Date: 1/29



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

JAN 17 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Robert M. Sielaty, Agent for Justeq07
Toxcel
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA. 20156

RE: 6 Month Progress Report dated Nov. 6, 2007
Product Name: Justeq07
EPA Registration Number: 84024-1

Dear Mr. Sielaty:

The Agency has reviewed the 6 month progress reports submitted in accordance with continuing registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended, and determined the studies are being conducted properly. The "finished" label that you submitted has been added to your file.

A copy of our review, D346403, is enclosed. If you have questions concerning this letter, please call Tom Luminello at (703) 308-8075, or contact by e-mail at luminello.tom@epa.gov.

Sincerely,

A handwritten signature in cursive script, reading "Emily H. Mitchell", is written above the typed name.

Emily H. Mitchell
Product Manager 32
Antimicrobials Division (7510-P)

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES
AND TOXIC
SUBSTANCES

1/02/08

DP BARCODE: D346403

MRID: None

SUBJECT: JUSTEQ07

REG. NO. OR FILE SYMBOL: 84024-1

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use ☐ OR End-use Product ☒

INGREDIENTS (PC Codes) (014703), (013907)

CAS Number: (7861-52-), (7647-15-5)

TEST LAB: None

SUBMITTER: JUSTEQ, LLC

GUIDELINE: 830 Guidelines

COMMODITIES: Formulation

REVIEWER: Krishna K Deb

ORGANIZATION: AD

APPROVER: Karen P. Hicks

APPROVED DATE: 1/4/08

COMMENT:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES
AND TOXIC
SUBSTANCES

01/02/08

MEMORANDUM

Subject: Chemistry Review for EPA Reg. No. 84024-1

From: Krishna K Deb, Chemist
Product Science Branch, CT Team
Antimicrobial Division (7510P)

Thru: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobial Division (7510P)

Thru: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobial Division (7510P)

To: Emilly Mitchell / Thomas Lumillo
Regulatory Management Branch
Antimicrobial Division (7510P)

Applicant: JUSTEC, LLC

Due date: 02/04/2008

Formulations from Label

Active Ingredient(s)

Sodium bromide-----1.50 %

Sodium hypochlorite-----7.00 %

Other Ingredients-----91.50 %

Total-----100.00 %

BACKGROUND:

Pursuant to instructions in EPA letter dated 10/18/2007 for conditional approval of EPA Reg. No 84024 -1, the registrant is providing six (6)-month progress report for the Storage Stability (830.6317) and Corrosion data (830.6320) that is being generated by Product Safety Labs of New Jersey. The registrant will continue to provide progress reports on these data as they are gradually generated. The registrant will submit one year full report on the above characteristics to EPA in May, 2008

FINDINGS:

1. The compositional data of the two active ingredients as determined by the Product Safety Labs for a period of six (6) months satisfy 830.6317 requirements.
2. The percentage of total weight change due to corrosion for six (6) months in a low density polyethylene container is found to be less than - 1.80, which satisfy 830.6320 (Corrosion Characteristics) requirements.

CONCLUSION:

Six (6) months interim progress report for storage stability (830.6317) and corrosion characteristics (830.6320) for end-use product, JUSTEQ07 (MIRID 471746-03) under EPA Reg.No84024-1, have been successfully met.

toXcel
Toxicology & Regulatory Affairs
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156
USA

Phone: (703) 335-5670

Fax: (703) 310-6950

November 6, 2007

Document Processing Desk (FPL)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re: Justeq07, EPA Reg. No. 84024-1

ATTN: Emily Mitchell, PM 32

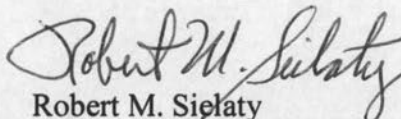
Dear Emily:

Pursuant to instructions in your letter dated October 18, 2007 for Conditional Approval of this registration, please find one (1) copy of the finished final printed label of the above-referenced product, for your records, on behalf of Justeq LLC of Naperville, Illinois.

As requested, we are also providing a copy of the 6-month progress report for the Storage Stability and Corrosion Characteristics data that is being generated by Product Safety Labs of New Jersey. We will continue to provide progress reports on this data as they are received.

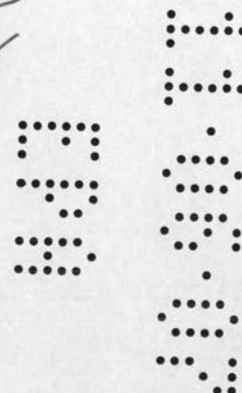
If you have any questions, please contact me at the above. Thank you.

Sincerely,


Robert M. Sielaty
Authorized Representative

Enclosures

cc: S. Shim



RISK ASSIGNMENT FORM
Antimicrobial Division/Regulatory Management Branch II

A

PRODUCT REVIEWER: *Tom Luminello* **RMB II TEAM 32**

Description of Action: **EPA File Symbol/Reg No.**

84024-1

Decision No. **Submission No.** **Fee for Service Action Code:**

FQPA Action Code: **Non-FQPA Action Code:** **PRIA FEE AMOUNT:**

362

DAY

MONTH

YEAR

APPLICATION DATE

6

11

07

EPA PIN DATE

6

11

07

**DATE RISK MANAGER
RECEIVED FROM FRONT END**

7

11

07

DATE SENT TO SCIENCE
[VIVIAN COMPLETES]

PRIA DUE DATE

NEGOTIATED DUE DATE

**Type of
Data:**

**PSB
Product
Chemistry**

**PSB Acute
Toxicology**

**PSB
Efficacy**

**RASSB
Environmental
Fate**

**RASSB
Ecological
Effects**

**RASSB
Chronic
Toxicology**

**RASSB
Exposure
/Residue**

Comments:

ATTACHMENTS: €-LABELING €-CSF(S) €-DATA €-OTHERS

B **For Arctic Slope Contract Only**

Contract No.: 0052

ARCTIC SLOPE/MANAGER

Final Task: Signature _____ **(Total hrs)**

C **Reviewer Comments:**

DATE FEE PAID:

RESPONSE CODE:

RESPONSE DATE:



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide – Section 1

1. Company/Product Number 84024-1	2. EPA Product Manager E. Mitchell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Justeq07	PM# 32	
5. Name And Address Of Applicant (Include ZIP Code) Justeq, LLC 2536 Whitehall Lane Naperville, IL 60564 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name	

Section II

<input type="checkbox"/> Amendment – Explain below.	<input checked="" type="checkbox"/> Final Printed labels in response to Agency letter dated <u>October 18, 2007</u>
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain Below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

The registrant is submitting a Final Printed Label and a progress report for Storage Stability and Corrosion Characteristics data, as requested.

Section III

1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Unit Packaging wgt. No. per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container 55 gal. Vented HDPE Drums	
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)			
Name Robert M. Sielaty	Title Authorized Representative	Telephone No. (include Area Code) (703) 335-5670	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.			6. Date Application Received
2. Signature 	3. Title Authorized Representative		
4. Typed Name Robert M. Sielaty	5. Date November 6, 2007		

6-Month Progress Report for "Justeq07" Real Time Storage Stability Study

This GLP study is currently underway and is being conducted by Eurofins Product Safety Labs (PSL study 21338) in New Jersey. This progress report is being submitted as requested by EPA in its conditional approval letter dated October 18, 2007 for the Justeq07 registration. A full storage stability and corrosion characteristics study report for one year of storage at ambient conditions will be submitted to the Agency upon its completion in May, 2008, when all data has been collected. This study will fulfill the data requirements for EPA/OPPTS 830.6317 and 830.6320.

Product Identification: Justeq07, Batch #JQ3001320070119A

NaOCl Spec. 7%

NaBr Spec. 1.5%

Storage Stability and Corrosion Characteristics

PSL Study number: 21338

Results: Composition of the test substance as determined by Product Safety Labs

Time (Months)	Concentration (%)	
	Sodium Hypochlorite	Sodium Bromide
Initial	6.9	1.4
2	6.7	1.5
3	6.8	1.5
6	6.7	1.3
9	TBD	TBD
12	TBD	TBD

This information represents an unaudited summary of the data.

Additional relevant findings may be presented in the Draft/Final report(s), which will be forwarded as they are completed. Please contact the Study Director, Bill Gravelle at 732-438-5100 ext 229 or at billgravelle@productsafetylabs.com.

DATA PACKAGE BEAN SHEET

Date: 07-Jan-2008

Page 1 of 1

Decision #: 385934

DP #: (346403)

NON PRIA

Parent DP#:

*** Registration Information ***

Registration: 84024-1 - JUSTEQ07

Company: 84024 - JUSTEQ, LLC

Risk Manager: RM 32 - Robert Brennis - (703) 308-6264 Room# CM-2 308G

Risk Manager Reviewer: Thomas Luminello, Jr. TLUMINEL

Sent Date: 07-Nov-2007

Calculated Due Date: 04-Feb-2008

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (362) FORMULA CHANGE;TECHNICAL;

Ingredients: 013907, Sodium bromide(1.5%)

014703, Sodium hypochlorite(7%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 07-Nov-2007

Due Back: _____

DP Ingredient: 013907, Sodium bromide

014703, Sodium hypochlorite

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

08-Nov-2007

Last Possible Science Due Date: 21-Dec-2007

Team Name: CTT

08-Nov-2007

07-Jan-2008

Science Due Date: 23-Dec-2007

Reviewer Name: Krishna, Deb

14-Nov-2007

03-Jan-2008

Sub Data Package Due Date: 07-Jan-2008

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Product chemistry: Please review the attached 6 months progress report for the requested data (Storage Stability and Corrosion Characteristics).

justeq

Justeq07

Justeq07 is an effective agent for controlling algae, bacteria, and fungi that produce slime in recirculating, condensing and cooling equipment and in reservoirs or ponds that serve as the source of boiler feedwater or cooling water. Justeq07 can also be used to control bacteria, algae and fungal slime in decorative fountains, and air washers.

ACTIVE INGREDIENTS	
Sodium hypochlorite.....	7.00%
Sodium bromide.....	1.50%
INERT INGREDIENTS	
Total.....	91.50%
Total Available Chlorine = approximately 6.7%	

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses if present after the first 5 minutes, then continue rinsing eyes.
- Call a poison control center or a doctor for treatment advice.

If on skin or clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or a doctor for treatment advice.

If inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, and the give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or a doctor for further treatment advice.

If swallowed:

- Call a poison control center or a doctor immediately for treatment advice.
- DO NOT INDUCE VOMITING, unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN:

Aspiration may cause lung damage. Probably mucosal damage may contraindicate the use of gastric lavage.

Have the product container, label or MSDS with you when calling a poison control center or a doctor, or going for medical treatment. In case of emergency call (800) 424-9300.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. CAUSES SKIN BURNS.

Do not get in eyes, on skin, or on clothing. Wear protective goggles, face shield, safety glasses, and chemical-resistant gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No.: 84024-1

EPA Est. No.: 6484-WI-001

Net Contents: 55 gallons (573# net.)

JUSTEQ LLC
2536 Whitehall Lane
Naperville, IL 60564

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board Regional Office of EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

COOLING PONDS, RESERVOIRS AND DECORATIVE FOUNTAINS

Justeq07 must be applied at the reservoir, pond, or fountain inlet or at a location that permits complete diffusion into the water at maximum retention time before reaching the outlet. Sufficient Justeq07 must be fed to maintain a total chlorine level of 1.0-4.0 ppm in all parts of the reservoir or pond (two fluid ounces per 1000 gallons of water yields about 1.4 ppm total chlorine).

INDUSTRIAL & COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS

Justeq07 must be applied directly to the cooling water at any section of the system where sufficient mixing will occur. Apply Justeq07 to the cooling water to provide a total chlorine level of 1.0-1.4 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the systems. Check the total chlorine level with a test and additional product applied until a reading of 1.0-1.4 ppm is obtained at the bleed-off point. The product can be added to the system either continuously or intermittently or as needed to obtain the above residual. The frequency of feeding and dosage rate will depend upon the severity of the problem.

AIR WASHERS (This product may be used only in industrial air washers and air systems which have mist-eliminating components)

For control of microorganisms in industrial air washer systems add sufficient Justeq07 to the air washer sump or chill water to provide a total chlorine level of 2.0-4.0 ppm. Badly fouled systems must be cleaned before treatment is begun. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained at the bleed-off point. Some systems may be maintained in satisfactory biological condition by applying this dosage once per day while others will respond better to dosages less than once per day.

HEAT TRANSFER SYSTEMS (Such as Evaporative Condensers, Hydrostatic Sterilizers and Retorts, Dairy Sweetwater Systems, and Once-Through Cooling Water Systems).

Justeq07 must be used at the same application rates, and in the same manner as described above. It must be added to the system at a point of uniform mixing such as a basin area, sump area, or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

STORAGE AND DISPOSAL

Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used must be diluted with water before disposal in a sanitary sewer. Do not reuse empty container but place in trash collection. Do not contaminate water or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Pesticide disposal wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse empty container. Triple rinse (or equivalent). Then puncture and dispose of in a sanitary landfill, or if allowed by State and Local authorities, by burning. If burned, stay out of the smoke.

Hypochlorite Solution, UN 1791

NOT REVIEWED

In accordance with FR Notice 84-4
Based on Draft Labeling Dated.

10/18/2007

NOT REVIEWED

In accordance with FR Notice 84-4
Based on Draft Labeling Dated.



"William Gravelle"
<BillGravelle@productsafetylabs.com>

01/03/2008 12:36 PM

To Krishna Deb/DC/USEPA/US@EPA

cc "Bob Sielaty" <rsielaty@toxcel.com>, "Gary Wnorowski"
<GaryWnorowski@productsafetylabs.com>, "Sang-Hea Shim" <justeq@gmail.com>

bcc

Subject Justeq07 6 month corrosion data

Dear Dr. Deb,

Attached please find the 6 month corrosion data for the JUSTEQ07 product containing NaBr and NaOCl, as you requested. Please feel free to contact me if you need additional data or information regarding this study.

Kind regards,

Bill Gravelle
Study Director
EUROFINS|PRODUCT SAFETY LABORATORIES, INC. www.productsafetylabs.com
2394 US Highway 130 Suite E
Dayton, NJ 08810
732-438-5100 ext. 229
E-mail to: billgravelle@productsafetylabs.com



21338 corrosion results - 6 month.pdf

Material to be added to a Mini-Jacket (in the case where an e-Jacket exists)

Reg. No. 840241

Send to SIG: check box

This material is:

☒ New stamped-accepted label
☐ New CSF
☐ Notification
☐ Final Printed Label
Other: Product Registration

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Tom Luminello

Phone: 308 8075 Division: AD

Date: 10/23/07



U.S. ENVIRONMENTAL PROTECTION
AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510-P)
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

EPA Reg.

Number:

84024-1

Date of

Issuance:

Oct. 18, 2007

Term of Issuance: page 1 of 2

Conditional

Name of Pesticide Product:

Justeq07

Name and Address of Registrant (include ZIP Code):

**Justeq, LLC
2536 Whitehall Lane
Naperville, Illinois 60564**

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and, submit acceptable responses required for re-registration of your product under FIFRA section 4.
2. Change EPA File Symbol 84024-R to EPA Registration Number 84024-1.
3. Change the beginning of the second sentence of the product description to: "Justeq07 can also be used to control bacteria, algae, and fungal slime..."
4. Revise the First Aid statement as follows: Under If in Eyes, change "rinse eyes" to "rinse eye". Under If Inhaled, insert "person" after move. Under If Swallowed, after the word vomiting add "unless told to do so by the Poison Control Center or Doctor". Do not give anything to drink must be changed to: Do not give anything by mouth to an unconscious person.
5. Correct the spelling of Irreversible on page 2. Revise the Personal Protective Equipment (PPE) language after the first sentence to read: Wear goggles, face shield,

Continued on page 2

Signature of Approving Official:

Emily H. Mitchell

Emily H. Mitchell
Product Manager 32
Antimicrobials Division (7510P)

Date:

October 18, 2007

5. (continued):

safety glasses, and chemical-resistant gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

6. Change the advisory instructions "may" and "can", to the mandatory instruction "must" in the Directions for Use as marked.

7. All instances of the advisory instruction "should," must be changed to the mandatory instruction "must".

8. Change the phrase "associated slime" to "algal slime" on page 2.

A copy of our review, D341681, of your product chemistry data submission is enclosed.

The Storage Stability and Corrosion Characteristics data must be submitted to the Agency as soon as the data are completed. You must submit a progress report on these data when you make your submission of your final printed label.

Submit one copy of the finished final printed label prior to releasing this product for sale.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the conditionally approved label is enclosed for your records.

PM-32 Edm (initials)

Date: October 18, 2007

Justeq07

and fungal ~~fungi and algae that produce slime~~ in decorative fountains, air washers, paper mill water systems, and food, beverage, and industrial process pasteurizers. *Algae*

ACTIVE INGREDIENTS:

Sodium hypochlorite 7.00%
Sodium bromide 1.50%

INERT INGREDIENTS 91.50%

Total 100.00%

Total Available chlorine = approximately 6.7%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses if present after the first 5 minutes, then continue rinsing eyes.
- Call a poison control center or a doctor for treatment advice.

If on skin or clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or a doctor for treatment advice.

If inhaled:

- Move to fresh air.
- If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or a doctor for further treatment advice.

If swallowed:

- Call a poison control center or a doctor immediately for treatment advice.
- DO NOT INDUCE VOMITING, unless told to do so by the poison control center or doctor.
- Do not give anything to drink.

NOTE TO PHYSICIAN:

Aspiration may cause lung damage. Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container, label or MSDS with you when calling a poison control center or a doctor, or going for treatment. In case of Medical Emergency, call (630) 428-4143.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 84024 - R

EPA Est. No.: 6484-WI-001

JUSTEQ LLC
2536 Whitehall Lane
Naperville, IL 60564

Net Contents _____

ACCEPTED
with COMMENTS
in EPA Letter Dated:

OCT 18 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.

84024-1

Justeq07 Label, 3 July 07

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. CAUSES IRRVERSABLE EYE DAMAGE. CAUSES SKIN BURNS. Do not get in eyes, on skin or on clothing. Wear protective eyewear such as face shield or safety glasses and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

rewrite per letter of conditions

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board Regional Office of EPA.

ACCEPTED
IN COMMENTS
in EPA Letter Dated:

DIRECTIONS FOR USE

OCT 18 2007

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No.

COOLING PONDS, RESERVOIRS AND DECORATIVE FOUNTAINS

Justeq07 may be applied at the reservoir, pond, or fountain inlet or at a location that permits complete diffusion into the water at maximum retention time before reaching the outlet. Sufficient Justeq07 should be fed to maintain a total chlorine level of 1.0-4.0 ppm in all parts of the reservoir or pond (two fluid ounces per 1000 gallons of water yields about 1.4 ppm total chlorine).

INDUSTRIAL & COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS

Justeq07 can be applied directly to the cooling water at any section of the system where sufficient mixing will occur. Apply Justeq07 to the cooling water to provide a total chlorine level of 1.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the systems. Check the total chlorine level with a test kit and additional product applied until a reading of 1.0-4.0 ppm is obtained at the bleed-off point. The product can be added to the system either continuously or intermittently or as needed to obtain the above residual. The frequency of feeding and dosage rate will depend upon the severity of the problem.

INDUSTRIAL PASTEURIZERS (Such as food, beverage, and industrial process pasteurizers)

For control of bacteria and fungi in industrial pasteurizers add 4 -8 ounces of Justeq07 per 1000 gallons of system water to achieve control. To maintain control add sufficient Justeq07 to maintain 2.0-4.0 ppm total chlorine throughout the system. (Two fluid ounces per 1000 gallons of water yields 1.4 ppm total chlorine.)

SHELL EGG PASTEURIZER WATER SYSTEMS

For control of bacteria, fungi and ^{algal} associated slime in shell egg pasteurizer water systems add 4-8 ounces of Justeq07 per 1000 gallons of system water to achieve control. To maintain control add sufficient Justeq07 to maintain 2.0-4.0 ppm total chlorine throughout the system. (Two fluid ounces per 1000 gallons of water yields 1.4 ppm total chlorine)

AIR WASHERS (This product may be used only in industrial air washers and air washer systems which have mist-eliminating components.)

For control of microorganisms in industrial air washer systems add sufficient Justeq07 to the air washer sump or chill water to provide a total chlorine level of 2.0-4.0 ppm. Badly fouled systems must be cleaned before treatment is begun. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained at the bleed-off point. Some systems may be maintained in satisfactory biological condition by applying this dosage once per day while others will respond

better to dosages less than one per day.

HEAT TRANSFER SYSTEMS (Such as Evaporative Condensers, Hydrostatic Sterilizers and Retorts, Dairy Sweetwater Systems, and Once-Through Cooling Water Systems)

Justeq07 ^{must} should be used at the same application rates, and in the same manner as described above. It should be added to the system at a point of uniform mixing such as a basin area, sump area, or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

PULP & PAPER MILL INFLUENT WATER SYSTEMS

^{must} Justeq07 should be applied to the raw water intake prior to the filter house, economizer, or process water. Feed at a dosage sufficient to provide total a chlorine level of 2.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. The total chlorine level ~~should~~ be checked with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained. Some systems can be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. Justeq07 can be used in pulp and paper influent water systems where the manufactured paper or paperboard can be used for food contact purposes.

PULP & PAPER MILL PROCESS WATER SYSTEMS

Add Justeq07 to paper making systems at a point of uniform mixing such as the beaters, broke chest pump, save-all tank, or white water tank. Feed at a dosage sufficient to provide a total chlorine level of 2.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained. Some systems can be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. Justeq07 can be used in pulp and paper mill process water systems where the manufactured paper or paperboard can be used for food contact purposes.

STORAGE AND DISPOSAL

Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used ^{must} ~~should~~ be diluted with water before disposal in a sanitary sewer. Do not reuse empty container but place in trash collection. Do not contaminate water, or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Pesticide disposal wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL Do not reuse empty container. Triple rinse (or equivalent). Then puncture and dispose of in a sanitary landfill, or, if allowed by State and Local authorities, by burning. If burned, stay out of smoke.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

OCT 18 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to Director: OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

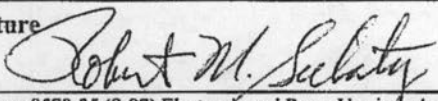
Date **September 17, 2007**EPA Reg. No./File Symbol **84024-R**Page **2** of **9**

Applicant's/Registrant's Name & Address:

JUSTEQ, LLC
2536 Whitehall Lane
Naperville, IL 60564

Product

JUSTEQ07Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT CHEMISTRY (Cont.):			FE = Formulator's Exemption		
830.7840 (63-8)	Water Solubility: Column Elution Method; Shake Flask Method		FE		
830.7950 (63-9)	Vapor Pressure		FE		
830.7370 (63-10)	Dissociation Constant		FE		
830.7550; 830.7560; 830.7570 (63-11)	Octanol-Water Partition Coefficient		FE		
830.7000 (63-12)	pH		JUSTEQ	OWN	Vol. 2 - 3
830.6313 (63-13)	Stability		FE		
830.6314 (63-14)	Oxidizing or Reducing Action		JUSTEQ	OWN	Vol. 2 - 3
830.6315 (63-15)	Flammability	Waiver Request	End use product does not contain combustible liquids.		
830.6316 (63-16)	Explosibility	Waiver Request	End use product is not potentially explosive		
830.6317 (63-17)	Storage Stability		JUSTEQ	OWN	Vol. 4
830.7100 (63-18)	Viscosity		JUSTEQ	OWN	Vol. 2 - 3
830.6319 (63-19)	Miscibility	Waiver Request	End use product is not an emulsifiable liquid and will not be diluted with petroleum solvents.		
Signature 			Name and Title Robert M. Sielaty, Company Representative		Date September 17, 2007

EPA Form 8570-35 (9-97) Electronic and Paper Versions Available. Submit only Paper version



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to Director: OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date **September 17, 2007**EPA Reg. No./File Symbol **84024-R**

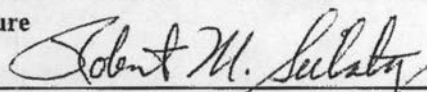
Page 3 of 9

Applicant's/Registrant's Name & Address

JUSTEQ, LLC
2536 Whitehall Lane
Naperville, IL 60564

Product

JUSTEQ07Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<u>PRODUCT CHEMISTRY</u> <u>(Cont.):</u>			FE = Formulator's Exemption		
830.6320 (63-20)	Corrosion Characteristics		JUSTEQ	OWN	Vol. 2
830.6321 (63-21)	Dielectric Breakdown Voltage	Waiver Request	End use product is not used around electrical equipment.		
(64-1)	Submittal of Sample		FE – available upon request		
<u>PRODUCT PERFORMANCE:</u>					
810.1000 (91-2)	Efficacy of Antimicrobial Agents		No public health claims – available upon request		
<u>TOXICITY:</u>					
870.1100 (81-1)	Acute Oral Toxicity: Rat		Cite All		
870.1200 (81-2)	Acute Dermal Toxicity: Rat		N/A		
870.1300 (81-3)	Acute Inhalation Toxicity: Rat		Cite All		
870.2400 (81-4)	Primary Eye Irritation: Rabbit		N/A		
870.2500 (81-5)	Primary Dermal Irritation		N/A		
870.2600 (81-6)	Dermal Sensitization		Cite All		
Signature 	Name and Title Robert M. Sielaty, Company Representative			Date September 17, 2007	

EPA Form 8570-35 (9-97) Electronic and Paper Versions Available. Submit only Paper version.



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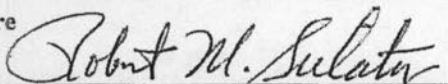
Form Approved OMB No. 2070-0060

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DATA MATRIX

Date September 17, 2007	EPA Reg. No./File Symbol 84024-R	Page 4 of 9
Applicant's/Registrant's Name & Address JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564		Product JUSTEQ07

Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<u>TOXICITY (Cont.):</u>			FE = Formulator's Exemption		
870.6200 (81-8, 81-7, 81-3)	Neurotoxicity Screening Battery (acute neurotoxicity; 90-Day neurotoxicity) (TGAI)		FE		
870.3100 (82-1)	90-Day Sub-chronic Oral Toxicity – rodent and non-rodent (TGAI)		FE		
870.3200 (82-2)	21-Day Dermal Toxicity – rabbit/rat (TGAI)		FE		
870.3250 (82-3)	90-Day Dermal Toxicity (TGAI)		FE		
870.3465 (82-4)	90-Day Inhalation Toxicity (TGAI)		FE		
870.4100 (83-1)	Chronic Feeding – rodent and non-rodent (TGAI)		FE		
870.4200 (83-2)	Carcinogenicity – rat and mouse (TGAI)		FE		
870.3700 (83-3)	Teratogenicity – one species (TGAI)		FE		
870.3800 (83-4)	Reproduction, 2-generation (TGAI)		FE		
870.7485 (85-1)	General Metabolism (TGAI)		FE		
Signature 	Name and Title Robert M. Sielaty, Company Representative			Date September 17, 2007	

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DATA MATRIX

Date **September 17, 2007**EPA Reg. No./File Symbol **84024-R**Page **5** of **9**

Applicant's/Registrant's Name & Address

JUSTEQ, LLC
2536 Whitehall Lane
Naperville, IL 60564

Product

JUSTEQ07Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<u>TOXICITY (Cont.):</u>			FE = Formulator's Exemption		
870.7600 (85-3)	Dermal Penetration (TGAI)		FE		
870.7200 (86-1)	Domestic Animal Safety (TGAI)		FE		
870.5265 (84-2)	Mutagenicity: Gene Mutation (Ames) (TGAI)		FE		
870.5395 (84-2)	Mutagenicity: Structural Chromosome Aberration (Micronucleus Assay) (TGAI)		FE		
870.5550 (84-4)	Mutagenicity: Other Genotoxicity Effects (<i>in vivo</i> UDS) (TGAI)		FE		
<u>ECOTOXICITY:</u>					
850.2100 (71-1)	Avian acute oral (quail <u>or</u> mallard) (TGAI)		FE		
850.2200 (71-2)	Avian dietary LC ₅₀ (mallard <u>and</u> quail) (TGAI)		FE		
850.2400 (71-3)	Wild Mammal Acute Toxicity (TGAI)		FE		
850.2300 (71-4)	Avian Reproduction (TGAI)		FE		
850.2500 (71-5)	Field Testing for Terrestrial Wildlife (TGAI)		FE		

Signature

Name and Title

Robert M. Sielaty, Company Representative

Date

September 17, 2007

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Form Approved OMB No. 2070-0060

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DATA MATRIX

Date September 17, 2007	EPA Reg. No./File Symbol 84024-R	Page 6 of 9
Applicant's/Registrant's Name & Address JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564	Product JUSTEQ07	

Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
ECOTOXICITY (Cont.):			FE = Formulator's Exemption		
870.1075 (72-1)	Freshwater fish LC ₅₀ (trout and bluegill) (TGAI)		FE		
850.1010 (72-2)	Acute freshwater invertebrates (Daphnia) (TGAI)		FE		
850.1075; 850.1025 or 1055; and 850.1035 or 1045 (72-3)	Acute LC ₅₀ or EC ₅₀ with estuarine/marine fish, bivalve, and shrimp species (TGAI)		FE		
850.1400 (72-4)	Fish early life stage study (TGAI)		FE		
850.1300 (72-5)	Invertebrate life cycle study (TGAI)		FE		
850.1730 (72-6; 165-4)	Bioaccumulation in Fish (TGAI)		FE		
850.1950 (72-7)	Field Testing for Aquatic Organisms (TGAI)		FE		
ENVIRONMENTAL FATE:					
835.2120 (161-1)	Hydrolysis (TGAI)		FE		
835.2240 (161-2)	Photodegradation in Water (TGAI)		FE		
835.4100 (162-1)	Aerobic Soil Metabolism (TGAI)		FE		
Signature <i>Robert M. Sielaty</i>			Name and Title Robert M. Sielaty, Company Representative		Date September 17, 2007

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DATA MATRIX

Date September 17, 2007	EPA Reg. No./File Symbol 84024-R	Page 7 of 9
Applicant's/Registrant's Name & Address: JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564	Product JUSTEQ07	

Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<u>ENVIRONMENTAL FATE</u> <u>(Cont.):</u>			FE = Formulator's Exemption		
835.4300 (162-4)	Aerobic Aquatic Metabolism (TGAI)		FE		
835.1230 (163-1)	Leaching and Adsorption/Desorption <u>or</u> Soil Column Leaching (TGAI)		FE		
835.6200 (164-2)	Aquatic Field Dissipation (TGAI)		FE		
835.6100 (164-5)	Soil Long-Term Accumulation Studies (TGAI)		FE		
860.1650 (165-1)	Rotational Crops: Confined (TGAI)		FE		
860.1900 (165-2)	Rotational Crops: Field (TGAI)		FE		
860.1400 (165-3)	Irrigated Crops (TGAI)		FE		
<u>NONTARGET INSECTS:</u>					
850.3020 (141-1)	Honey Bee Acute Contact (TGAI)		FE		
850.3030 (141-2)	Honey Bee Toxicity of Residues on Foliage (TGAI)		FE		
850.3040 (141-5)	Field Testing for Pollinators (TGAI)		FE		
Signature Robert M. Sielaty	Name and Title Robert M. Sielaty, Company Representative			Date September 17, 2007	

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DATA MATRIX

Date	September 17, 2007	EPA Reg. No./File Symbol	84024-R	Page 8 of 9
Applicant's/Registrant's Name & Address:		Product		
JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564		JUSTEQ07		

Ingredient: Sodium bromide and Sodium hypochlorite

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
RESIDUE CHEMISTRY:			FE = Formulator's Exemption		
860.1100 (171-2)	Chemical Identity (TGAI)		FE		
860.1200 (171-3)	Directions for Use (TGAI)		FE		
860.1300 (171-4A)	Plant Metabolism (TGAI)		FE		
860.1300 (171-4B)	Livestock Metabolism (TGAI)		FE		
860.1340 (171-4C)	Residue Analytical Method (TGAI)		FE		
860.1500 (171-4K)	Magnitude of Residue: Crop field trials (TGAI)		FE		
860.1520 (171-4L)	Magnitude of Residue: Processed food/feed (TGAI)		FE		
860.1480 (171-4J)	Magnitude of Residue: Meat, Milk, Poultry, Eggs (TGAI)		FE		
860.1400 (171-4)	Magnitude of Residue: Water, Fish, and Irrigated Crops – Irrigation Crops (TGAI)		FE		
860.1400 (171-4)	Magnitude of Residue: Water, Fish, and Irrigated Crops – Water (TGAI)		FE		
860.1400 (171-4)	Magnitude of Residue: Water, Fish, and Irrigated Crops – Fish (TGAI)		FE		

Signature	Name and Title	Date
	Robert M. Sielaty, Company Representative	September 17, 2007



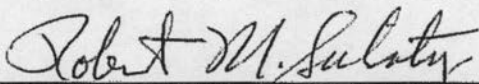
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DATA MATRIX

Date September 17, 2007		EPA Reg. No./File Symbol 84024-R		Page 9 of 9	
Applicant's/Registrant's Name & Address: JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564		Product JUSTEQ07			
Ingredient: Sodium bromide and Sodium hypochlorite					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<u>RESIDUE CHEMISTRY</u> <u>(Cont.):</u>			FE = Formulator's Exemption		
(171-5)	Reduction of Residue (TGAI)		FE		
860.1550 (171-6)	Proposed Tolerance (TGAI)		FE		
860.1560 (171-7)	Reasonable Grounds in Support of the Petition (TGAI)		FE		
860.1650 (171-13)	Submittal of Analytical Reference Standards (TGAI)		FE		
Signature 			Name and Title Robert M. Sielaty, Company Representative		Date September 17, 2007

EPA Form 8570-35 (9-97) Electronic and Paper Versions Available/Submit only Paper version.



"Bob Sielaty"
<rsielaty@toxcel.com>
09/17/2007 01:22 PM

To Tom Luminello/DC/USEPA/US@EPA
cc Emily Mitchell/DC/USEPA/US@EPA, Michael
Hardy/DC/USEPA/US@EPA
bcc
Subject RE: EPA File Symbol 84024-R

Tom,

In the interest of moving this registration to approval, we are complying with your request to revise the data matrix by including the generic data requirements for aquatic foodcrop use for the active ingredients that are being purchased from registered sources, and for which Justeq LLC is using the Formulator's Exemption.

Under 40 CFR 152.85, "FIFRA ... excuses an applicant from the requirement to submit or cite data pertaining to the safety of any ingredient ... that is derived solely from ... EPA-registered products...." (Emphasis added) As required, Justeq submitted EPA form 8570-27 to identify the active ingredients and their suppliers. Therefore, Justeq is not required to make an offer to pay to the registrants of the active ingredients because the cost of the data is incorporated into the purchase price of the active ingredients.

I trust this will be sufficient to complete processing of this application.

Bob

Robert M. Sielaty, J.D.
Executive Director of Product Registration
and General Counsel
toXcel, LLC
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156
Tel: (703) 335-5670
Fax: (703) 310-6950
Email: rsielaty@toxcel.com

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-----Original Message-----

From: Luminello.Tom@epamail.epa.gov [mailto:Luminello.Tom@epamail.epa.gov]
Sent: Thursday, September 13, 2007 4:56 PM
To: Bob Sielaty
Cc: Mitchell.Emily@epamail.epa.gov; Hardy.Michael@epamail.epa.gov
Subject: Re: EPA File Symbol 84024-R

Bob - Your new data matrix will have to be revised as the Paper Mill use allows for food contact on paper so you will have to account for the requirements in Appendix A triggered by Aquatic Foodcrop use.
Tom Luminello

Fee Paid

PRIA - Me-Too, Fast Track Registrant

EPA File Symbol: 84024-R EPA Receipt Date: 7/9/01 Fee Paid: Yes ☒ No ☐

No.	Check List Item	Yes	No
1.	Application Form (EPA Form 8570-1) -signed & complete including package type? - Make sure Box 6 is completed: Need to know Me-Too Product	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	Confidential Statement of Formula (EPA Form 8570-29)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	a) Is the CSF completely filled out (Boxes 1-21) and totals are accurate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Is product a 100% Repack?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	c) If product is not a 100% repack, check the following:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	1) Compare new product's formulation with Me-TOO formulation. Are they identical? If yes, go to Label Review, step 6.	<input type="checkbox"/>	<input type="checkbox"/>
	2) If no, was product chemistry cited or submitted?	<input type="checkbox"/>	<input type="checkbox"/>
3.	Formulator's Exemption Statement (EPA Form 8570-27)? [Applicable, if PRIA is not 100% repack] Is it completed properly? (Does CSF list a registered source?)	<input type="checkbox"/>	<input type="checkbox"/>
4.	Certification with Respect to Citation of Data (EPA Form 8570-34)? [Applicable, if submission is not a 100% repack]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	a) Did applicant check a Method of Support?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?	<input type="checkbox"/>	<input type="checkbox"/>
	c) Is the form signed and dated?	<input type="checkbox"/>	<input type="checkbox"/>
	d) Check form and Data Matrix; are Exclusive Use data cited from other sources?	<input type="checkbox"/>	<input type="checkbox"/>
	1.) If Yes, is the required authorization letter included in application?	<input type="checkbox"/>	<input type="checkbox"/>
5.	Data Matrix (EPA Form 8570-35) [Applicable, if submission is not a 100% repack]	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	a) Selective Method? [If No, data matrix not required; Only a list of companies offered to pay]	<input type="checkbox"/>	<input type="checkbox"/>
	1) Complete Product Specific Data Matrix: Address product chemistry, acute toxicology, and efficacy data requirements	<input type="checkbox"/>	<input type="checkbox"/>
	2) Are the cited studies in the matrix appropriate for this proposed product? (You must ensure the formulation associated w/ cited studies are substantially similar/identical to proposed product's' formulation)	<input type="checkbox"/>	<input type="checkbox"/>
	b) If Formulator's Exemption Statement was not addressed because registrant owns/formulates the source of active ingredient in product formulation, was a generic data matrix included?	<input type="checkbox"/>	<input type="checkbox"/>
	1) Selective Method? (If No, data matrix not required; Only a list of companies offered to pay)	<input type="checkbox"/>	<input type="checkbox"/>
	a) Complete Generic Data Matrix: Address product chemistry, toxicology, ecological effects, environmental fate, exposure, and residue chemistry if food use	<input type="checkbox"/>	<input type="checkbox"/>
	b) Public copy of Matrix provided? See PR Notice 98-5	<input type="checkbox"/>	<input type="checkbox"/>
7.	Data	<input type="checkbox"/>	<input type="checkbox"/>
	1) Data passed 86-5? If not, go to step 8.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	2) Was data conducted according to Good Laboratory Practices (GLPs)? If not, go to step 9	<input type="checkbox"/>	<input type="checkbox"/>
8.	Label	<input type="checkbox"/>	<input type="checkbox"/>
	1) Are all required elements present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Compare / look at original
to other labels

change to
A 54 for Waiver request

9. Data Issues				
Type of Study	MRID No.	86-5 Reject/ GLP	Date Registrant Contacted	Withdrawal or Renegotiate?

Comments:

DATA PACKAGE BEAN SHEET

Date: 17-Jul-2007

Page 1 of 2

Decision #: 381092

DP #: (341681)

PRIA

Parent DP#:

COPY FOR YOUR
INFORMATION

*** Registration Information ***

Registration: 84024-R - JUSTEQ07

Company: 84024 - JUSTEQ, LLC

Risk Manager: RM 32 - Robert Brennis - (703) 308-6264 Room# CM-2 308G

Risk Manager Reviewer: Thomas Luminello, Jr. TLUMINEL

Sent Date: _____

Calculated Due Date: 28-Oct-2007

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A53) ME-TOO;NEW PRODUCT;FAST TRACK;

Ingredients: _____

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 17-Jul-2007

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

Last Possible Science Due Date: 28-Sep-2007

Team Name: CTT

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Product chemistry please review the attached cover letter, CSF, label and product chemistry studies (MRID#s 471746-01 thru -03) submitted to support registration of subject's product

DATA PACKAGE BEAN SHEET

Date: 17-Jul-2007

Page 1 of 3

Decision #: 381092

DP #: (341682)

PRIA

Parent DP#:

*** Registration Information ***

Registration: 84024-R - JUSTEQ07

Company: 84024 - JUSTEQ, LLC

Risk Manager: RM 32 - Robert Brennis - (703) 308-6264 Room# CM-2 308G

Risk Manager Reviewer: Thomas Luminello, Jr. TLUMINEL

Sent Date: _____

Calculated Due Date: 28-Oct-2007

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A53) ME-TOO;NEW PRODUCT;FAST TRACK;

Ingredients: _____

FILE
COPY FOR YOUR
INFORMATION

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 17-Jul-2007

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

Last Possible Science Due Date: 28-Sep-2007

Team Name: CTT

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

Printed on Page 3

*** Data Package Instructions ***

Acute Tox please review the attached cover letter, CSF, Label and MRID# 471746-04 (acute tox waiver requests) submitted to support registration of subject's product.

RISK ASSIGNMENT FORM
Antimicrobial Division/Regulatory Management Branch II

A Completed by Product Manager

PRODUCT REVIEWER: *Tom Lumarello* RMB 2 TEAM 32

Description of Action: EPA File Symbol/Reg No.
84024-R

Decision No. *381092* Submission No. *813161* Fee for Service Action Code: *A53*

FQPA Action Code:	Non-FQPA Action Code:		PRIA FEE AMOUNT:
	DAY	MONTH	YEAR
APPLICATION DATE	<i>6</i>	<i>7</i>	<i>2007</i>
EPA PIN DATE	<i>9</i>	<i>7</i>	<i>2007</i>
DATE PM RECEIVED FROM FRONT END	<i>17</i>	<i>7</i>	<i>2007</i>
DATE SENT TO SCIENCE (VIVIAN COMPLETES)			
DATE RECEIVED FROM SCIENCE			
DATE DUE TO PM			

Type of Data:	PSB Product Chemistry	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure /Residue
	<i>X</i>	<i>X</i>					

COMMENTS:

ATTACHMENTS: e-LABELING e-CSF(S) e-DATA e-OTHERS

B For Arctic Slope Contract Only

Contract No.: 0052 ARCTIC SLOPE/MANAGER

Final Task: Signature _____ (Total hrs)

C Reviewer Comments:

DATE FEE PAID: RESPONSE CODE: RESPONSE DATE:

JACKETS (Fileroom Document Tracking System)
Requested Jackets Report (New Requests)

16-Jul-2007
12:10 PM
Young, Ollie

Requested by : Luminello, Jr., Thomas
Agency : EPA Office : OPPTS Program : OPP
Division : AD Branch : RMB2

Barcode : 21439
Page 1 of 1

Requested on 16-Jul-2007 at 12:05 PM

Group Num: 139723

Jacket Barcode	Regulatory Case File #	Vol/Tot	Location	Status
9275275	84024-R	1 / 1	File Rm: 67 / A / 01 / 1	Under Review (11-Jul-2007)
Total # of jackets requested :		1		

Completed: ay Date: 7/14 Time: 12:10

- Needs CRP
- FDA Clearance
- PPE
- "Please" submit efficacy data
- Offer to pay statement

Luminello, Jr., Thomas



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 11, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
Or Pay On-Line at www.Pay.Gov

OPP Decision Number: D-381092
EPA File Symbol or Registration Number: 84024-R
Product Name: JUSTEQ07
EPA Receipt Date: 09-Jul-2007
EPA Company Number: 84024
Company Name: JUSTEQ, LLC

ROBERT M. SIELATY
TOXCEL LLC
JUSTEQ, LLC
7140 HERITAGE VILLAGE PLAZA, PO Box 363
GAINESVILLE, VA 20156-

SUBJECT: Receipt of Application Subject to Registration Service Fee - Fast Track

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: A53

ME-TOO;NEW PRODUCT;FAST TRACK;

Within 30 days, please remit payment in the amount of: \$ 1,050 to the address below.

If you do not submit payment within 30 days of the date of this letter, the Agency will reject your application pursuant to Section 3(c)(3)(B) of FIFRA. Any subsequent submission relating to this action must be submitted as a new application.

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee

PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S, Crystal Drive.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-6432.

Sincerely,

Front End Processing Staff

Information Technology & Resources Management Division

Fee for Service

{813161v~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☐ Studies? ☐ Fee Waiver?
☐ volpay % Reduction: _____

for Division

- ☒ AD
- ☐ BPPD
- ☐ RD

Risk Mgr. 32

Receipt No.

S-

813161

EPA File Symbol/Reg. No.

84024-R

Pin-Punch Date:

7/9/2007

☐ This item is NOT subject to FFS action.

Action Code:

Requested: A53

Granted: A53

Amount Due: \$ 1050.00

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Mitchell Thompson

Date: 7-11-07

Remarks:

toXcel**Toxicology & Regulatory Affairs**

P.O. Box 363

7140 Heritage Village Plaza

Gainesville, VA 20156

USA

Phone: (703) 335-5670

Fax: (703) 310-6950

HAND DELIVERED

July 6, 2007

Document Processing Desk (REGFEE)
 Office of Pesticide Programs (7504P)
 U.S. Environmental Protection Agency
 Room S-4900, One Potomac Yard
 2777 South Crystal Drive
 Arlington, VA 22202-4501

*Please evaluate
 waiver request
 PPE directions*

RE: New Product Registration Application
 "Justeq07" - EPA File Symbol 84024-R

Dear Sir/Madam:

On behalf of Justeq, LLC of Naperville, Illinois, we are submitting an application for "Justeq07" containing the active ingredients sodium hypochlorite and sodium bromide to control algae, bacteria, and fungi for industrial uses.

The following has been provided:

1. Application for Registration (EPA Form 8570-1)
2. Formulator's Exemption (EPA Form 8570-27)
3. Confidential Statement of Formula (EPA Form 8570-4) – Two (2) copies
4. Label – Five (5) copies
5. Data Matrix (EPA Form 8570-35)– Public and Private versions
6. Transmittal Document
7. Studies per PRN 86-5 – Three (3) copies

As I stated in my response dated July 2, 2007 to the Agency, the Justeq label is identical to the existing registered label of "Brommax" (EPA Reg. No. 63838-3). The composition of "Justeq07" is substantially similar to the compositions of "Brommax", as well as "Stabrex" (EPA Reg. No. 1706-179) and "Stabrom" (EPA Reg. No. 3377-74). The only difference is that Justeq has developed a patented process to stabilize the halogens in the product. All of the information has been described in the product chemistry data.

Due to the high pH and corrosive nature of Justeq 07, Justeq has presented justification to request waivers of the acute toxicity studies, as supported by the decision of the Antimicrobials Division on July 2, 2007. Accordingly, the label contains the toxicity category I of "DANGER" and instructions for Personal Protective Equipment. (PPE).

With the limited amount of information to be reviewed, we believe that the application can be processed under PRIA category A53 for a timeframe of three (3) months.

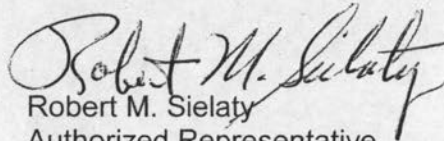
Letter to EPA re Ju. 07

July 6, 2007

Page 2

If you have any questions or require additional information, please contact me by email at rsielaty@toxcel.com or by phone at 703-335-5670. Thank you.

Sincerely,


Robert M. Sielaty
Authorized Representative

Enclosures

CC: S. Shim, Justeq LLC

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter (Registrant)

Justeq, LLC
2536 Whitehall Lane
Naperville, IL 60564
(EPA Company ID No. 84024)

Agent:
toXcel, LLC
7140 Heritage Village Plaza
Gainesville, VA 20155

2. Regulatory Action for which this Package is Submitted:

EPA File Symbol No. 84024-R – Application for Justeq07

3. Transmittal Date

July 6, 2007

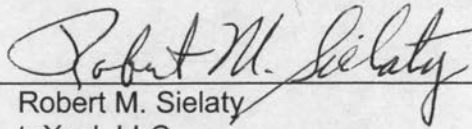
4. List of Submitted Documents

	Volume 1	Administrative Materials
47174601	Volume 2	Product Identity, Composition, and Analysis OPPTS Test Guidelines: Group A: 830.1550, 830.1600, 830.1650, 830.1670, 830.1700, 830.1750, 830.1800, 830.1900; Group B: 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7000, 830.7100, 830.7200, 830.7220, 830.7300, 830.7370, 830.7550, 830.7840, and 830.7950: Final Report (2007). Compilation. Unpublished study prepared by toXcel, LLC. 57p.
47174602	Volume 3	Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, pH, Viscosity, and Density/Relative Density: Final Report (2007). Study number 21339. Unpublished study prepared by Product Safety Laboratories. 33p.
47174603	Volume 4	Accelerated Storage Stability Study: Final Report (2007). Study number 21337. Unpublished study prepared by Product Safety Laboratories. 39p.
47174604	Volume 5	Acute Toxicity Waiver Request; U.S. EPA Pesticide Assessment Guidelines §870.1100, 870.1200, 870.1300, 870.2400, 870.2500 and 870.2600: Final Report (2007). Unpublished study prepared by toXcel, LLC. 4p.

5. Company Contact

Company Name: JUSTEQ, LLC

Authorized Representative:



Robert M. Sielaty
toXcel, LLC
7140 Heritage Village Plaza
Gainesville, VA 20155
email: rsielaty@toxcel.com
Telephone: (703) 335-5670
FAX: (703) 310-6950



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Monday, August 13, 2007

MEMORANDUM

Subject: Acute Toxicity Review for EPA Reg. No.: 84024-R/ Justeq07
DP Barcode: D341682

To: Emily Mitchell, PM 32/ Tom Luminello
Regulatory Management Branch
Antimicrobials Division (7510C)

From: Ian Blackwell, Biologist
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510C)

Through: Karen Hicks, Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510C)

Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510C)

Applicant: Justeq, LLC

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Sodium hypochlorite	7.00
Sodium bromide	1.50
<u>Other Ingredient(s):</u>	<u>91.50</u>
Total:	100.00

- 1) **BACKGROUND:** Justeq, LLC, requests the waiver of each of the six acute toxicity requirements for their product, "Justeq07". The waiver requests are based upon the pH of the product being 11.7. These waiver requests are presented in a report assigned MRID Number 471746-04.
- 2) **RECOMMENDATIONS:** PSB findings are:
 - a) CTT/PSB waives each of the following studies due to the high pH of the product. These four waivers are in accordance with the 40 CFR §158.340:
 - i) acute dermal toxicity
 - ii) primary eye irritation
 - iii) primary skin irritation
 - iv) dermal sensitization
 - b) The acute inhalation toxicity study is waived in accordance with unpublished Agency guidance. That policy states that a product which is deemed corrosive may receive a waiver of the acute inhalation toxicity study; but, it will be assigned toxicity category I for acute inhalation.
 - c) CTT denies the waiver of the acute oral toxicity study. The reasons for the waiver denial are as follows:
 - i) The 40 CFR does not provide provisions for the waiver of the acute oral toxicity study based upon the pH of the product.
 - ii) CTT is not aware of any other Agency policy which permits the waiver of the acute oral toxicity study based upon pH.
 - iii) CTT has reviewed the acute toxicity profile of a product with the same active ingredients as File Symbol 84024-R. The toxicity category of the acute oral toxicity study is far from category I. CTT does not wish to over-label its products.

The acute toxicity profile for EPA File Symbol 84024-R is currently:

Study	MRID Number	Toxicity Category	Status
Acute Oral Toxicity	None		Data Gap
Acute Dermal Toxicity	None	I	Waived
Acute Inhalation Toxicity	None	I	Waived
Primary Eye Irritation	None	I	Waived
Primary Skin Irritation	None	I	Waived
Dermal Sensitization	None	I	Waived

3) LABELING:

- a) The signal word is "DANGER", based upon the categorization of the primary eye and skin irritation studies.
- b) CTT will not recommend more precautionary labeling at this time, due to the data gap.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

ON AGENCY

*File
copy*

September 12, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-381092
EPA File Symbol or Registration Number: 84024-R
Product Name: JUSTEQ07
EPA Receipt Date: 09-Jul-2007
EPA Company Number: 84024
Company Name: JUSTEQ, LLC

ROBERT M. SIELATY
TOXCEL LLC
JUSTEQ, LLC
7140 HERITAGE VILLAGE PLAZA, PO Box 363
GAINESVILLE, VA 20156-

SUBJECT: Receipt of Application Subject to Registration Service Fee - Fast Track - Revised

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

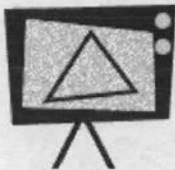
The Action previously identified as A54 has been reclassified as Action Code: A53

ME-TOO;NEW PRODUCT;FAST TRACK;

The fee associated with this action is \$1,050. Payment has been received in that amount. No additional payment is due for this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-6432.

Sincerely,
Front End Processing Staff
Information Technology & Resources Management Division



Tom Luminello/DC/USEPA/US

09/12/2007 12:31 PM

To John Jamula/DC/USEPA/US@EPA

cc

bcc

Subject Revise Justeq07 84024-R please

John - Can you change this application back to A 53. Sorry for the inconveniences.

In reviewing these requirements, we find that three studies (acute dermal toxicity, acute eye irritation, and acute dermal irritation) are not required under 40 CFR Part 158.340 (and draft 40 CFR 158.1105), due to its pH of 11.7. If Emily will advise us that the Agency is ready to approve the application, we will provide a Certification with Respect to Data (EPA form 8570-34) at that time.

On this basis, we request that the application be reclassified as Action Code A53, which has already been satisfied by the previous payment of \$1,050, and continue to be processed accordingly. We trust that this resolves any remaining issues.

If there are any further questions, please contact me immediately. Thanks for your assistance.

Bob

Robert M. Sielaty, J.D.
Executive Director of Product Registration
and General Counsel
toXcel, LLC
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156
Tel: (703) 335-5670
Fax: (703) 310-6950
Email: rsielaty@toxcel.com

"Bob Sielaty"
<rsielaty@toxcel
.com>

09/12/2007 11:30
AM

To
Emily Mitchell/DC/USEPA/US@EPA
CC
Tom Luminello/DC/USEPA/US@EPA,
Michael Hardy/DC/USEPA/US@EPA
Subject
EPA File Symbol 84024-R

Dear Emily,

Can you please tell me the status of the application for "Justeq07" that we amended as outlined in the attached email last month? I would like to provide the information to my client who is planning to travel soon. Thank you.

Bob

Robert M. Sielaty, J.D.
Executive Director of Product Registration
and General Counsel
toXcel, LLC
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156
Tel: (703) 335-5670
Fax: (703) 310-6950
Email: rsielaty@toxcel.com

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(See attached file: 20070827.email to EPA RE Justeq07 84024-R.txt)



Data Matrix Sept 17 2007.pdf



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to Director: OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date August 27, 2007		EPA Reg. No./File Symbol 84024-R		Page 5 of 5	
Applicant's/Registrant's Name & Address JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564		Product JUSTEQ07			
Ingredient: Sodium bromide and Sodium hypochlorite					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
ENVIRONMENTAL FATE:					
835.2120 (161-1)	Hydrolysis (TGAI)		FE		
Signature <i>Robert M. Sielaty</i>			Name and Title Robert M. Sielaty, Company Representative		Date August 27, 2007

EPA Form 8570-35 (9-97) Electronic and Paper Versions Available. Submit only Paper version.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

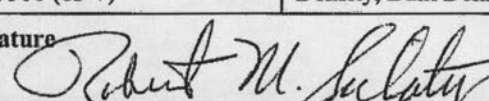
Form Approved OMB No. 2070-0060

401 M Street, S.W.
WASHINGTON, D.C. 20460

REVISED

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to Director: OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date September 17, 2007		EPA Reg. No./File Symbol 84024-R		Page 1 of 9	
Applicant's/Registrant's Name & Address: JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564		Product JUSTEQ07			
Ingredient: Sodium bromide and Sodium hypochlorite					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT CHEMISTRY:			FE = Formulator's Exemption		
830.1550 (61-1)	Product Identity and Composition		JUSTEQ	OWN	Vol. 2
830.1600 (61-2(a))	Description of Materials Used to Produce the Product		JUSTEQ	OWN	Vol. 2
830.1620 (61-2(a))	Description of Production Process	Not Applicable	See Formulation Process		
830.1650 (61-2(a))	Description of Formulation Process		JUSTEQ	OWN	Vol. 2
830.1670 (61-2(b))	Discussion of Formation of Impurities		JUSTEQ	OWN	Vol. 2
830.1700 (62-1)	Preliminary Analysis		FE		
830.1750 (62-2)	Certification of Limits		JUSTEQ	OWN	Vol. 2
830.1800 (62-3)	Analytical Methods to Verify Certified Limits		JUSTEQ	OWN	Vol. 2
830.6302 (63-2)	Color		JUSTEQ	OWN	Vol. 2 - 3
830.6303 (63-3)	Physical State		JUSTEQ	OWN	Vol. 2 - 3
830.6304 (63-4)	Odor		JUSTEQ	OWN	Vol. 2 - 3
830.7200 (63-5)	Melting Point		FE		
830.7220 (63-6)	Boiling Point		FE		
830.7300 (63-7)	Density, Bulk Density or Specific Gravity		JUSTEQ	OWN	Vol. 2 - 3
Signature 			Name and Title Robert M. Sielaty, Company Representative		Date September 17, 2007



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

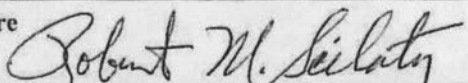
Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to Director: OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

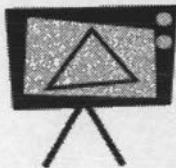
Date August 27, 2007	EPA Reg. No./File Symbol 84024-R	Page 4 of 5
Applicant's/Registrant's Name & Address JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564	Product JUSTEQ07	

Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
TOXICITY (Cont.):			FE = Formulator's Exemption		
870.3100 (82-1)	90-Day Sub-chronic Oral Toxicity – rodent and non-rodent (TGAI)		FE		
870.3700 (83-3)	Teratogenicity – one species (TGAI)		FE		
870.5265 (84-2)	Mutagenicity: Gene Mutation (Ames) (TGAI)		FE		
870.5395 (84-2)	Mutagenicity: Structural Chromosome Aberration (Micronucleus Assay) (TGAI)		FE		
870.5550 (84-4)	Mutagenicity: Other Genotoxicity Effects (<i>in vivo</i> UDS) (TGAI)		FE		
ECOTOXICITY:					
850.2100 (71-1)	Avian acute oral (quail or mallard) (TGAI)		FE		
850.2200 (71-2)	Avian dietary LC ₅₀ (mallard and quail) (TGAI)		FE		
870.1075 (72-1)	Freshwater fish LC ₅₀ (trout and bluegill) (TGAI)		FE		
850.1010 (72-2)	Acute freshwater invertebrates (Daphnia) (TGAI)		FE		

Signature 	Name and Title Robert M. Sielaty, Company Representative	Date August 27, 2007
---	---	-------------------------

EPA Form 8570-35 (9-97) Electronic and Paper Versions Available. Submit only Paper version.



Tom
Luminello/DC/USEPA/US
08/21/2007 11:00 AM

To John Jamula/DC/USEPA/US@EPA
cc Michael Hardy/DC/USEPA/US@EPA
bcc
Subject Revised Fee Category for 84024-R

John - Can you revise this application from A53 to A54 because of the Acute Tox data review please?
Thanks Tom Luminello

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES
Antimicrobial Division

09/06/2007

DP BARCODE: 341681

MRID: 471746-01), (471746-02), (471746-3)

SUBJECT JUSTEQ07

REG. NO. OR FILE SYMBOL: 84024-R

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use ☐ OR End-use Product ☒

INGREDIENTS (PC Codes) (128997)

CAS Number: (107534-96-3)

TEST LAB: None

SUBMITTER: OSMOSE, INC.

GUIDELINE: None

COMMODITIES: FORMULA CHANGE: TECHNICAL

REVIEWER: Krishna K. Deb ORGANIZATION:
AD

APPROVER: Karen P. Hicks APPROVED DATE: 9/13/07

COMMENT:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES
Antimicrobial Division

08/31/2007

TO: Emily Mitchell/ Thomas Luminello
PM Team 32

FROM: Krishna K. Deb, Chemist
Product Science Branch, CT Team
Antimicrobial Division (7510P)

THRU: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobial Division (7510P)

THRU: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobial Division (7510P)

APPLICANT JUSTEQ LLC

Action code: A53

Due date: 10/28/2007

Active Ingredient(s)

Sodium hypochlorite-----	7.00 %
Sodium bromide -----	1.50 %
Inert Ingredients-----	<u>91.50 %</u>
Total ----	100.00 %

BACKGROUND:

JUSTEQ LLC has submitted an application for registration of a new end-use product, Justeq07. The data package included a Confidential Statement of Formula (CSF) for the basic formulation (dated July 9, 2007). The registered products,

[REDACTED], are the sources of the active ingredients.

This product is designed for controlling algae, bacteria, and fungi that produce slime in recirculating condensing and cooling equipment; reservoirs or ponds.

FINDINGS:

Group A Requirements – Product Chemistry Data for JUSTEQ07 (MRID 471746-01)

- Group A product chemistry data requirements applicable to end-use products have been met (See Table A of this report.).

Group B Requirements – Product Chemistry Data for JUSTEQ07 (MRID 471746-01);, Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/ Reduction, pH, Viscosity, and Density/ Relative Density of JUSTEQ07 (MRID 471746-02); and Accelerated Storage Stability Study for JUSTEQ07, (MRID 471746-03).

- Group B product chemistry data requirements applicable to end-use products have been met, with the exception of 830.6317 (Storage Stability) and 830.6320 (Corrosion Characteristics). See the “Recommendations” section of this report.
- Information was reported on EPA Form 8570-36 (Summary of the Physical/Chemical Properties (PR Notice 98-1)), and accompanied by EPA Form 8570-37 (Self-Certification Statement for the Physical/Chemical Properties (PR Notice 98-1)).
- For the study assigned MRID 471746-02, a Good Laboratory Practices (GLP) statement was provided stating that the study meets the requirements of 40 CFR Part 160.
- For the study assigned MRID 471746-03, a GLP statement was provided stating that the study meets the requirements of 40 CFR Part 160.

Confidential Statement of Formula

- The requirements of PR Notice 91-2 were satisfied. The nominal concentration of the active ingredients given in the Basic CSF agreed with percentages declared on the product label.
- The certified limits for the active and inert ingredients given in the Basic CSF were acceptable.
- All the active and inert ingredients are EPA registered for use in this and other pesticide products.

Product Label

- Submitted five (5) copies of label for approval.

RECOMMENDATIONS:

- To satisfy 830.6317 (Storage Stability) and 830.6320 (Corrosion Characteristics) requirements, the applicant must provide results for a minimum of 1 year from a GLP-compliant study
- The "Storage and Disposal" section of product label and the "Extinguishing Media" is incompatible with monoammonium phosphate, a chemical widely used as a fire extinguishing agent. Appropriate revisions should be made for storage.

PRODUCT CHEMISTRY REVIEW

I. CONFIDENTIAL STATEMENT OF FORMULA

a. Type of formulation and source registration:

- Non-integrated formulation system [X]
- Are all TGAIs used registered? Yes [X]
No []
- Integrated formulation system []
- If "ME-TOO," specify EPA Reg. No. of existing product: _____

b. Clearance of inerts for non-food or food use:

The product is cleared for food use under 40 CFR §§180.940 and 180.950.

Yes [X]
No []

c. Physical state of product:

Liquid

- d. The chemical IDs and analytical information (including that for the TGAIs), density, pH, and flammability are consistent with that given in 830 Series, Group B.

Yes [X]

No []

- e. The NCs and CLs are acceptable.

Yes [X]

No []

Note: The proposed certified limits for the two active ingredients differ from standard certified limit due to the limitations of the manufacturing process

f. Active ingredient(s)	<u>NC</u>	<u>LCL</u>
<u>UCL</u>		
(%)	(%)	(%)
Sodium hypochlorite	7.0	6.3
7.7		
Sodium bromide	1.50	1.35
1.65		

- g. For products produced by an integrated formulation system:

- Do all impurities of toxicological significance have a UCL?
Yes [] No [] Not applicable [X]
- Have all impurities of $\geq 0.1\%$ in the product been identified?
Yes [] No [] Not applicable [X]

II PRODUCT LABEL

- a. The active ingredient(s) statement (chemical IDs and NC) is consistent with the CONFIDENTIAL STATEMENT OF FORMULA. Yes [X]
No []

- b. The formula contains one of the following:

- 10% or more of a petroleum distillate: No [X]
- 1.0% or more of methyl alcohol: No [X]
- sodium nitrite at any level: No [X]
- a toxic List 1 inert at any level: No [X]
- arsenic in any form: No [X]

- c. If "yes" to any of the above, does the inert ingredients statement contain a footnote indicating this? Yes [] No [] Not applicable [X]

The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products.

Yes [X] No []

Table A:
Product Chemistry (830 Series, Group A)

Data Requirements	Acceptance of Information	MRID No.
830.1550 Product Identity ¹	A	471746-01
830.1600 Description of Materials	A	471746-01
830.1620 Production Process ²	NA	
830.1650 Formulation Process ³	A	471746-01
830.1670 Formation of Impurities ⁴	A	471746-01
830.1700 Preliminary Analysis ⁵	Not required for a non-integrated formulation system.	
830.1750 Certified Limits ⁶	A – A signed certification statement was provided.	471746-01
830.1800 Analytical Method ⁷	A – A copy of a titration method was provided for the active ingredient, sodium hypochlorite	471746-01
830.1900 Submittal of Samples	[Samples are to be provided on a case-by-case for end-use products.]	

Explanation: A=acceptable; N=not acceptable (i.e., item was submitted but is not acceptable); NA=technically not applicable (i.e., not required); G=data gap (i.e., item was not submitted but is required); U=requires upgrading (i.e., item is unacceptable but upgradeable); W=waived; E=EPA estimate.

¹See Confidential Appendix A for additional information

²For MP/EP products produced by an integrated formulation system.

³For products from a TGAI or MP.

⁴May be waived unless actual/possible impurities are of toxicological concern.

⁵Five batch analysis required for products produced by an integrated formulation system.

⁶If different from standard CLs recommended in 40 CFR 158.175, this should be discussed in Confidential Appendix A.

⁷Abbreviate method used as follows: gas chromatography (GC), infrared (IR), ultraviolet absorption (UV), nuclear magnetic resonance (NMR), etc.

Table B:
Physical and Chemical Characteristics (Series 830, Group B)

Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.6302 Color	A	The color of the product is pale yellow at 22°C, based on visual inspection.	471746-01 and 471746-02
830.6303 Physical State	A	The product is a clear liquid at 22°C.	471746-01 and 471746-02
830.6304 Odor	A	The product has a slightly chlorine odor at 22°C.	471746-01 and 471746-02
830.6313 Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	NA	Not required for end-use products.	
830.6314 Oxidation/Reduction; Chemical Incompatibility	A	<p>The product was placed in contact with water, monoammonium phosphate, iron powder, potassium permanganate, and kerosene. The product showed no reaction initially or after 24 hours when mixed with water, iron power, and kerosene. The product was observed to be incompatible with monoammonium phosphate (i.e., evaluation of flame immediately) and potassium permanganate (i.e., temperature increased by 6°C within 2 minutes).</p> <p>Note: The “Extinguishing Media” section of the MSDS does not specify that the product is incompatible with monoammonium phosphate, a chemical widely used as a fire extinguishing agent.</p>	471746-01 and 471746-02

Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.6315 Flammability/ Flame Extension	A	The product does not contain combustible liquids and has water as a primary ingredient. The applicant requested a waiver for this requirement.	471746-01
830.6316 Explodability	A	The product is not explosive and does not contain explosive ingredients. The applicant requested a waiver for this requirement.	471746-01
830.6317 Storage Stability	G	An accelerated storage stability study was carried out in a low-density polyethylene (LDPE) container. CIPAC Handbook, MT 46 Accelerated Storage Tests by Heating was referenced. The product was analyzed initially for active ingredient content and following a 14-day storage period in a 54°C incubator. The concentration of both active ingredients decreased over the 14-day storage period. The active ingredient concentrations on Day 14 were less than the lower certified limits. A storage stability study is currently underway, and will be provided to EPA once complete.	471746-01 and 471746-03
830.6319 Miscibility ¹	A	The product is not emulsifiable and is not intended to be diluted in petroleum products. The applicant requested a waiver for this requirement.	471746-01
830.6320 Corrosion	G	A corrosion	471746-

Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
Characteristics		characteristics study is currently underway, and will be provided to EPA once complete.	01
830.6321 Dielectric Breakdown Voltage	A	The product is not intended for use around electrical equipment. The applicant requested a waiver for this requirement.	471746-01
830.7000 pH ²	A	The mean pH of the product was reported to be 11.70±0.11 at 23.2-23.7°C. CIPAC MT-75 was referenced. A 1% w/w solution of the product in deionized water was used. Testing was conducted in compliance with GLP, as required.	471746-01 and 471746-02
830.7050 UV/Visible Absorption	NA	Not required for end-use products.	
830.7100 Viscosity	A	The mean kinematic viscosity of the product was reported to be 2.515 centistokes at 20°C and 1.511 centistokes at 40°C (as determined using a capillary viscometer). ASTM Methods D445/ D466 were referenced. Testing was conducted in compliance with GLP, as required.	471746-01 and 471746-02
830.7200 Melting Point/Melting Range	NA	Not required for end-use products.	
830.7220 Boiling Point/Boiling Range	NA	Not required for end-use products.	
830.7300 Density/Relative Density/Bulk Density	A	The density of the product was reported to be 1.252 g/mL at 20°C. CIPAC MT-3, ASTM Method D891-95 and OECD Guideline No. 109 were referenced. Testing was conducted in compliance with GLP, as required.	471746-01 and 471746-02

Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.7370 Dissociation Constants in Water	NA	Not required for end-use products.	
830.7550/830.7560/830.7570 Partition Coefficient	NA	Not required for end-use products.	
830.7840/830.7860 Water Solubility	NA	Not required for end-use products.	
830.7950 Vapor Pressure	NA	Not required for end-use products.	

Explanation: A=acceptable; N=not acceptable (i.e., item was submitted but is not acceptable); NA=technically not applicable (i.e., not required); G=data gap (i.e., item was not submitted but is required); U=requires upgrading (i.e., item is unacceptable but upgradeable); W=waived; E=EPA estimate.

- Provide brief description, e.g., color – yellow or property value, e.g., density 1.25 g/cc. Unless otherwise indicated, the property should be at
- 25°C.

¹If product is an emulsifiable liquid

²If product is dispersible with water

CONCLUSION:

This amendment, which requested approval for the registration of a new manufacturing product entitled “JusteQ07”, is accepted considering all the product chemistry data submitted under MERID #s 471748-01, 471748-02 and 471748-03, and the Basic CSF.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

File Copy

August 21, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
Or Pay On-Line at www.Pay.Gov (See Below for Details)

OPP Decision Number: D-381092
EPA File Symbol or Registration Number: 84024-R
Product Name: JUSTEQ07
EPA Receipt Date: 09-Jul-2007
EPA Company Number: 84024
Company Name: JUSTEQ, LLC

ROBERT M. SIELATY
TOXCEL LLC
JUSTEQ, LLC
7140 HERITAGE VILLAGE PLAZA, PO Box 363
GAINESVILLE, VA 20156-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee - **Revised**

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action previously identified as A53 has been reclassified as Action Code: A54

NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

The fee associated with this action is \$4,200. Payment in the amount of \$1,050 has been received. **Please remit additional payment in the amount of \$3,150.**

By USPS:

USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit www.pay.gov. From the [pay.gov](http://www.pay.gov) home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

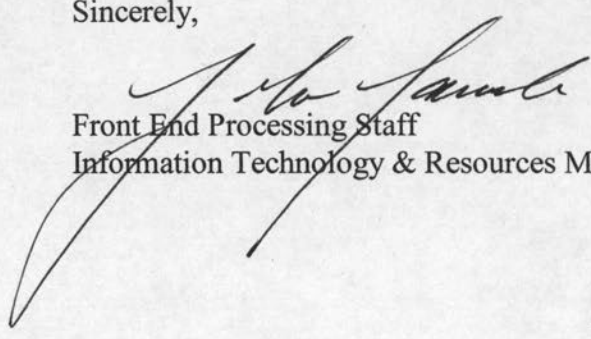
By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S4900 Potomac Yard 1
2777 S. Crystal Dr.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-6432.

Sincerely,



Front End Processing Staff
Information Technology & Resources Management Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, And Telephone Number Justeq, LLC 2536 Whitehall Lane Naperville, IL 60564	EPA Registration Number/File Symbol 84024-R 1
Active Ingredient(s) and/or representative test compound(s) Sodium hypochlorite and sodium bromide	Date July 9, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) — Aquatic Noncrop, specifically industrial water systems	Product Justeq07

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 7/9/07	Typed or Printed Name and Title Robert M. Sielaty Authorized Representative
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

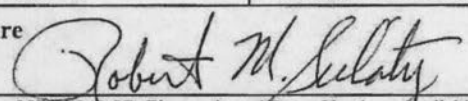
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DATA MATRIX

Date August 27, 2007	EPA Reg. No./File Symbol 84024-R	Page 1 of 5
Applicant's/Registrant's Name & Address: JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564		Product JUSTEQ07

Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT CHEMISTRY:			FE = Formulator's Exemption		
830.1550 (61-1)	Product Identity and Composition		JUSTEQ	OWN	Vol. 2
830.1600 (61-2(a))	Description of Materials Used to Produce the Product		JUSTEQ	OWN	Vol. 2
830.1620 (61-2(a))	Description of Production Process	Not Applicable	See Formulation Process		
830.1650 (61-2(a))	Description of Formulation Process		JUSTEQ	OWN	Vol. 2
830.1670 (61-2(b))	Discussion of Formation of Impurities		JUSTEQ	OWN	Vol. 2
830.1700 (62-1)	Preliminary Analysis		FE		
830.1750 (62-2)	Certification of Limits		JUSTEQ	OWN	Vol. 2
830.1800 (62-3)	Analytical Methods to Verify Certified Limits		JUSTEQ	OWN	Vol. 2
830.6302 (63-2)	Color		JUSTEQ	OWN	Vol. 2 - 3
830.6303 (63-3)	Physical State		JUSTEQ	OWN	Vol. 2 - 3
830.6304 (63-4)	Odor		JUSTEQ	OWN	Vol. 2 - 3
830.7200 (63-5)	Melting Point		FE		
830.7220 (63-6)	Boiling Point		FE		
830.7300 (63-7)	Density, Bulk Density or Specific Gravity		JUSTEQ	OWN	Vol. 2 - 3
Signature 			Name and Title Robert M. Sielaty, Company Representative		Date August 27, 2007

EPA Form 8570-35 (9-97) Electronic and Paper Versions Available. Submit only Paper version



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

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WASHINGTON, D.C. 20460

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DATA MATRIX

Date August 27, 2007	EPA Reg. No./File Symbol 84024-R	Page 2 of 5
Applicant's/Registrant's Name & Address: JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564		Product JUSTEQ07

Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT CHEMISTRY (Cont.):			FE = Formulator's Exemption		
830.7840 (63-8)	Water Solubility: Column Elution Method; Shake Flask Method		FE		
830.7950 (63-9)	Vapor Pressure		FE		
830.7370 (63-10)	Dissociation Constant		FE		
830.7550; 830.7560; 830.7570 (63-11)	Octanol-Water Partition Coefficient		FE		
830.7000 (63-12)	pH		JUSTEQ	OWN	Vol. 2 - 3
830.6313 (63-13)	Stability		FE		
830.6314 (63-14)	Oxidizing or Reducing Action		JUSTEQ	OWN	Vol. 2 - 3
830.6315 (63-15)	Flammability	Waiver Request	End use product does not contain combustible liquids.		
830.6316 (63-16)	Explosibility	Waiver Request	End use product is not potentially explosive		
830.6317 (63-17)	Storage Stability		JUSTEQ	OWN	Vol. 4
830.7100 (63-18)	Viscosity		JUSTEQ	OWN	Vol. 2 - 3
830.6319 (63-19)	Miscibility	Waiver Request	End use product is not an emulsifiable liquid and will not be diluted with petroleum solvents.		

Signature 	Name and Title Robert M. Sielaty, Company Representative	Date August 27, 2007
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

401 M Street, S.W.

WASHINGTON, D.C. 20460

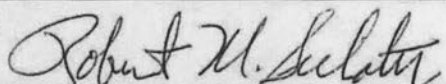
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DATA MATRIX

Date August 27, 2007	EPA Reg. No./File Symbol 84024-R	Page 3 of 5
Applicant's/Registrant's Name & Address JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564	Product JUSTEQ07	

Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT CHEMISTRY (Cont.):			FE = Formulator's Exemption		
830.6320 (63-20)	Corrosion Characteristics		JUSTEQ	OWN	Vol. 2
830.6321 (63-21)	Dielectric Breakdown Voltage	Waiver Request	End use product is not used around electrical equipment.		
(64-1)	Submittal of Sample		FE – available upon request		
PRODUCT PERFORMANCE:					
810.1000 (91-2)	Efficacy of Antimicrobial Agents		No public health claims – available upon request		
TOXICITY:					
870.1100 (81-1)	Acute Oral Toxicity: Rat		Cite All		
870.1200 (81-2)	Acute Dermal Toxicity: Rat		N/A		
870.1300 (81-3)	Acute Inhalation Toxicity: Rat		Cite All		
870.2400 (81-4)	Primary Eye Irritation: Rabbit		N/A		
870.2500 (81-5)	Primary Dermal Irritation		N/A		
870.2600 (81-6)	Dermal Sensitization		Cite All		

Signature 	Name and Title Robert M. Sielaty, Company Representative	Date August 27, 2007
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EPA Form 8570-35 (9-97) Electronic and Paper Versions Available. Submit only Paper version.

toXcel

Toxicology & Regulatory Affairs

P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156
USA

Phone: (703) 335-5670

Fax: (703) 310-6950

HAND DELIVERED

July 6, 2007

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: New Product Registration Application
"Justeq07" - EPA File Symbol 84024-R

Dear Sir/Madam:

On behalf of Justeq, LLC of Naperville, Illinois, we are submitting an application for "Justeq07" containing the active ingredients sodium hypochlorite and sodium bromide to control algae, bacteria, and fungi for industrial uses.

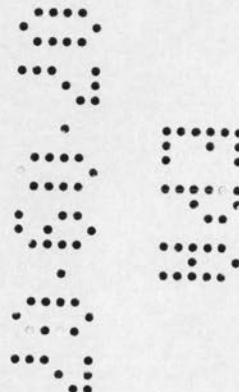
The following has been provided:

1. Application for Registration (EPA Form 8570-1)
2. Formulator's Exemption (EPA Form 8570-27)
3. Confidential Statement of Formula (EPA Form 8570-4) – Two (2) copies
4. Label – Five (5) copies
5. Data Matrix (EPA Form 8570-35)– Public and Private versions
6. Transmittal Document
7. Studies per PRN 86-5 – Three (3) copies

As I stated in my response dated July 2, 2007 to the Agency, the Justeq label is identical to the existing registered label of "Brommax" (EPA Reg. No. 63838-3). The composition of "Justeq07" is substantially similar to the compositions of "Brommax", as well as "Stabrex" (EPA Reg. No. 1706-179) and "Stabrom" (EPA Reg. No. 3377-74). The only difference is that Justeq has developed a patented process to stabilize the halogens in the product. All of the information has been described in the product chemistry data.

Due to the high pH and corrosive nature of Justeq 07, Justeq has presented justification to request waivers of the acute toxicity studies, as supported by the decision of the Antimicrobials Division on July 2, 2007. Accordingly, the label contains the toxicity category I of "DANGER" and instructions for Personal Protective Equipment. (PPE).

With the limited amount of information to be reviewed, we believe that the application can be processed under PRIA category A53 for a timeframe of three (3) months.



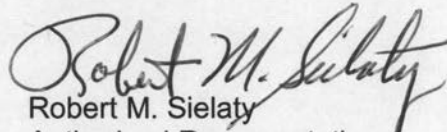
Letter to EPA re Justeq07

July 6, 2007

Page 2

If you have any questions or require additional information, please contact me by email at rsielaty@toxcel.com or by phone at 703-335-5670. Thank you.

Sincerely,


Robert M. Sielaty
Authorized Representative

Enclosures

CC: S. Shim, Justeq LLC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

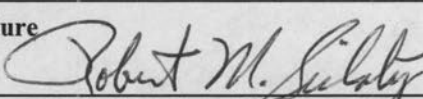
Form Approved OMB No. 2070-0060

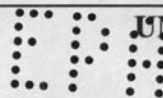
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DATA MATRIX

Date July 6, 2007	EPA Reg. No./File Symbol 84024-R	Page 1 of 5
Applicant's/Registrant's Name & Address: JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564	Product JUSTEQ07	

Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT CHEMISTRY:			FE = Formulator's Exemption		
830.1550 (61-1)	Product Identity and Composition		JUSTEQ	OWN	Vol. 2
830.1600 (61-2(a))	Description of Materials Used to Produce the Product		JUSTEQ	OWN	Vol. 2
830.1620 (61-2(a))	Description of Production Process	Not Applicable	See Formulation Process		
830.1650 (61-2(a))	Description of Formulation Process		JUSTEQ	OWN	Vol. 2
830.1670 (61-2(b))	Discussion of Formation of Impurities		JUSTEQ	OWN	Vol. 2
830.1700 (62-1)	Preliminary Analysis		FE		
830.1750 (62-2)	Certification of Limits		JUSTEQ	OWN	Vol. 2
830.1800 (62-3)	Analytical Methods to Verify Certified Limits		JUSTEQ	OWN	Vol. 2
830.6302 (63-2)	Color		JUSTEQ	OWN	Vol. 2 - 3
830.6303 (63-3)	Physical State		JUSTEQ	OWN	Vol. 2 - 3
830.6304 (63-4)	Odor		JUSTEQ	OWN	Vol. 2 - 3
830.7200 (63-5)	Melting Point		FE		
830.7220 (63-6)	Boiling Point		FE		
830.7300 (63-7)	Density, Bulk Density or Specific Gravity		JUSTEQ	OWN	Vol. 2 - 3
Signature 			Name and Title Robert M. SIELATY, Company Rep		Date July 6, 2007



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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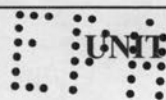
DATA MATRIX

Date July 6, 2007	EPA Reg. No./File Symbol 84024-R	Page 2 of 5
Applicant's/Registrant's Name & Address: JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564	Product JUSTEQ07	

Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT CHEMISTRY (Cont.):			FE = Formulator's Exemption		
830.7840 (63-8)	Water Solubility: Column Elution Method; Shake Flask Method		FE		
830.7950 (63-9)	Vapor Pressure		FE		
830.7370 (63-10)	Dissociation Constant		FE		
830.7550; 830.7560; 830.7570 (63-11)	Octanol-Water Partition Coefficient		FE		
830.7000 (63-12)	pH		JUSTEQ	OWN	Vol. 2 - 3
830.6313 (63-13)	Stability		FE		
830.6314 (63-14)	Oxidizing or Reducing Action		JUSTEQ	OWN	Vol. 2 - 3
830.6315 (63-15)	Flammability	Waiver Request	End use product does not contain combustible liquids.		
830.6316 (63-16)	Explosibility	Waiver Request	End use product is not potentially explosive		
830.6317 (63-17)	Storage Stability		JUSTEQ	OWN	Vol. 4
830.7100 (63-18)	Viscosity		JUSTEQ	OWN	Vol. 2 - 3
830.6319 (63-19)	Miscibility	Waiver Request	End use product is not an emulsifiable liquid and will not be diluted with petroleum solvents.		

Signature Robert M. Sielaty	Name and Title Robert M. SIELATY, Company REP	Date July 6, 2007
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Form Approved OMB No. 2070-0060

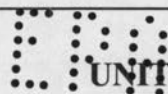
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DATA MATRIX

Date	July 6, 2007	EPA Reg. No./File Symbol	84024-R	Page 3 of 5	
Applicant's/Registrant's Name & Address		Product			
JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564		JUSTEQ07			
Ingredient: Sodium bromide and Sodium hypochlorite					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT CHEMISTRY (Cont.):			FE = Formulator's Exemption		
830.6320 (63-20)	Corrosion Characteristics		JUSTEQ	OWN	Vol. 2
830.6321 (63-21)	Dielectric Breakdown Voltage	Waiver Request	End use product is not used around electrical equipment.		
(64-1)	Submittal of Sample		FE – available upon request		
PRODUCT PERFORMANCE:					
810.1000 (91-2)	Efficacy of Antimicrobial Agents		No public health claims – available upon request		
TOXICITY:					
870.1100 (81-1)	Acute Oral Toxicity: Rat		JUSTEQ	WAIVER	Vol. 5
870.1200 (81-2)	Acute Dermal Toxicity: Rat		JUSTEQ	WAIVER	Vol. 5
870.1300 (81-3)	Acute Inhalation Toxicity: Rat		JUSTEQ	WAIVER	Vol. 5
870.2400 (81-4)	Primary Eye Irritation: Rabbit		JUSTEQ	WAIVER	Vol. 5
870.2500 (81-5)	Primary Dermal Irritation		JUSTEQ	WAIVER	Vol. 5
870.2600 (81-6)	Dermal Sensitization		JUSTEQ	WAIVER	Vol. 5
Signature			Name and Title		Date
			ROBERT M. SLEZATY, Company Rep		July 6, 2007



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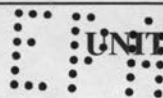
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DATA MATRIX

Date July 6, 2007		EPA Reg. No./File Symbol 84024-R		Page 4 of 5	
Applicant's/Registrant's Name & Address JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564		Product JUSTEQ07			
Ingredient: Sodium bromide and Sodium hypochlorite					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<u>TOXICITY (Cont.):</u>			FE = Formulator's Exemption		
870.3100 (82-1)	90-Day Sub-chronic Oral Toxicity – rodent and non-rodent (TGAI)		FE		
870.3700 (83-3)	Teratogenicity – one species (TGAI)		FE		
870.5265 (84-2)	Mutagenicity: Gene Mutation (Ames) (TGAI)		FE		
870.5395 (84-2)	Mutagenicity: Structural Chromosome Aberration (Micronucleus Assay) (TGAI)		FE		
870.5550 (84-4)	Mutagenicity: Other Genotoxicity Effects (<i>in vivo</i> UDS) (TGAI)		FE		
<u>ECOTOXICITY:</u>					
850.2100 (71-1)	Avian acute oral (quail <u>or</u> mallard) (TGAI)		FE		
850.2200 (71-2)	Avian dietary LC ₅₀ (mallard <u>and</u> quail) (TGAI)		FE		
870.1075 (72-1)	Freshwater fish LC ₅₀ (trout and bluegill) (TGAI)		FE		
850.1010 (72-2)	Acute freshwater invertebrates (Daphnia) (TGAI)		FE		
Signature Robert M. Sieraty			Name and Title Robert M. SIERATY, Company Rep		Date July 6, 2007



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date July 6, 2007	EPA Reg. No./File Symbol 84024-R	Page 5 of 5
Applicant's/Registrant's Name & Address JUSTEQ, LLC 2536 Whitehall Lane Naperville, IL 60564	Product JUSTEQ07	

Ingredient: **Sodium bromide and Sodium hypochlorite**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<u>ENVIRONMENTAL FATE:</u>					
835.2120 (161-1)	Hydrolysis (TGAI)		FE		

Signature <i>Robert M. Sezaty</i>	Name and Title <i>Robert M. SEZATY, COMPANY REP</i>	Date July 6, 2007
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EPA Form 8570-35 (9-97) Electronic and Paper Versions Available. Submit only Paper version.

toXcel**Toxicology & Regulatory Affairs**

P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156
USA

Phone: (703) 335-5670

Fax: (703) 310-6950

HAND DELIVERED

July 6, 2007

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

*Please review
chemistry data.*

RE: New Product Registration Application
"Justeq07" - EPA File Symbol 84024-R

Dear Sir/Madam:

On behalf of Justeq, LLC of Naperville, Illinois, we are submitting an application for "Justeq07" containing the active ingredients sodium hypochlorite and sodium bromide to control algae, bacteria, and fungi for industrial uses.

The following has been provided:

1. Application for Registration (EPA Form 8570-1)
2. Formulator's Exemption (EPA Form 8570-27)
3. Confidential Statement of Formula (EPA Form 8570-4) – Two (2) copies
4. Label – Five (5) copies
5. Data Matrix (EPA Form 8570-35)– Public and Private versions
6. Transmittal Document
7. Studies per PRN 86-5 – Three (3) copies

As I stated in my response dated July 2, 2007 to the Agency, the Justeq label is identical to the existing registered label of "Brommax" (EPA Reg. No. 63838-3). The composition of "Justeq07" is substantially similar to the compositions of "Brommax", as well as "Stabrex" (EPA Reg. No. 1706-179) and "Stabrom" (EPA Reg. No. 3377-74). The only difference is that Justeq has developed a patented process to stabilize the halogens in the product. All of the information has been described in the product chemistry data.

Due to the high pH and corrosive nature of Justeq 07, Justeq has presented justification to request waivers of the acute toxicity studies, as supported by the decision of the Antimicrobials Division on July 2, 2007. Accordingly, the label contains the toxicity category I of "DANGER" and instructions for Personal Protective Equipment. (PPE).

With the limited amount of information to be reviewed, we believe that the application can be processed under PRIA category A53 for a timeframe of three (3) months.

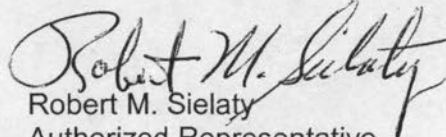
Letter to EPA re J. .q07

July 6, 2007

Page 2

If you have any questions or require additional information, please contact me by email at rsielaty@toxcel.com or by phone at 703-335-5670. Thank you.

Sincerely,


Robert M. Sielaty
Authorized Representative

Enclosures

CC: S. Shim, Justeq LLC

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter (Registrant)

Justeq, LLC
2536 Whitehall Lane
Naperville, IL 60564
(EPA Company ID No. 84024)

Agent:
toXcel, LLC
7140 Heritage Village Plaza
Gainesville, VA 20155

2. Regulatory Action for which this Package is Submitted:

EPA File Symbol No. 84024-R – Application for Justeq07

3. Transmittal Date

July 6, 2007

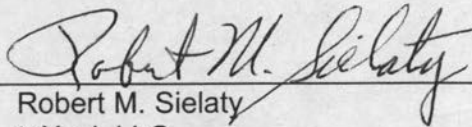
4. List of Submitted Documents

	Volume 1	Administrative Materials
47174601	Volume 2	Product Identity, Composition, and Analysis OPPTS Test Guidelines: Group A: 830.1550, 830.1600, 830.1650, 830.1670, 830.1700, 830.1750, 830.1800, 830.1900; Group B: 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7000, 830.7100, 830.7200, 830.7220, 830.7300, 830.7370, 830.7550, 830.7840, and 830.7950: Final Report (2007). Compilation. Unpublished study prepared by toXcel, LLC. 57p.
47174602	Volume 3	Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, pH, Viscosity, and Density/Relative Density: Final Report (2007). Study number 21339. Unpublished study prepared by Product Safety Laboratories. 33p.
47174603	Volume 4	Accelerated Storage Stability Study: Final Report (2007). Study number 21337. Unpublished study prepared by Product Safety Laboratories. 39p.
47174604	Volume 5	Acute Toxicity Waiver Request; U.S. EPA Pesticide Assessment Guidelines §870.1100, 870.1200, 870.1300, 870.2400, 870.2500 and 870.2600: Final Report (2007). Unpublished study prepared by toXcel, LLC. 4p.

5. Company Contact

Company Name: JUSTEQ, LLC

Authorized Representative:



Robert M. Sielaty
toXcel, LLC
7140 Heritage Village Plaza
Gainesville, VA 20155
email: rsielaty@toxcel.com
Telephone: (703) 335-5670
FAX: (703) 310-6950



United States
Environmental Protection Agency
Washington, DC 20460

☒ **Registration**
☐ **Amendment**
☐ **Other**

OPP Identifier Number

Application for Pesticide – Section 1

1. Company/Product Number 84024-R	2. EPA Product Manager E. Mitchell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Justeq07	PM# 32	
5. Name And Address Of Applicant (Include ZIP Code) Justeq, LLC 2536 Whitehall Lane Naperville, IL 60564 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 63838-3 Product Name BROMMAX

Section II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification – Explain below.	<input checked="" type="checkbox"/> Other – Explain Below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

The registrant is submitting a registration application for a new antimicrobial product containing registered active ingredients. The registration falls into the A53, New Product, Me-Too, Fast-Track category which corresponds to a review time of 3 months.

Section III

1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Unit Packaging wgt. No. per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container 55 gal. Vented HDPE Drums	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Robert M. Sielaty	Title Authorized Representative	Telephone No. (Include Area Code) (703) 335-5670	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received
2. Signature 		3. Title Authorized Representative	
4. Typed Name Robert M. Sielaty		5. Date July 6, 2007	



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

JUSTEQ, LLC
2536 Whitehall Lane,
Naperville, IL 60564

EPA File Symbol/Registration Number

84024-R

Product Name

Justeq07

Date of Confidential Statement of Formula (EPA Form 8570-4)

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Sodium Hypochlorite
Sodium Bromide

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Sodium Hypochlorite	[REDACTED]	[REDACTED]
Sodium Bromide	[REDACTED]	[REDACTED]
Signature 	Name and Title Robert M. Sielaty	Date 6. Juli 2007

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy

Product ingredient source information may be entitled to confidential treatment

Justeq07

Justeq07 is an effective agent for controlling algae, bacteria, and fungi that produce slime in recirculating condensing and cooling equipment and in reservoirs or ponds that serve as the source of boiler feedwater or cooling water. Justeq07 can also be used to control bacteria, fungi and algae that produce slime in decorative fountains, air washers, paper mill water systems, and food, beverage, and industrial process pasteurizers.

ACTIVE INGREDIENTS:

Sodium hypochlorite 7.00%
Sodium bromide 1.50%

INERT INGREDIENTS 91.50%

Total 100.00%

Total Available chlorine = approximately 6.7%

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID

If in eyes:

- ⊗ Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- ⊗ Remove contact lenses if present after the first 5 minutes, then continue rinsing eyes.
- ⊗ Call a poison control center or a doctor for treatment advice.

If on skin or clothing:

- ⊗ Take off contaminated clothing.
- ⊗ Rinse skin immediately with plenty of water for 15-20 minutes.
- ⊗ Call a poison control center or a doctor for treatment advice.

If inhaled:

- ⊗ Move to fresh air.
- ⊗ If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible.
- ⊗ Call a poison control center or a doctor for further treatment advice.

If swallowed:

- ⊗ Call a poison control center or a doctor immediately for treatment advice.
- ⊗ DO NOT INDUCE VOMITING.
- ⊗ Do not give anything to drink.

NOTE TO PHYSICIAN:

Aspiration may cause lung damage. Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container, label or MSDS with you when calling a poison control center or a doctor, or going for treatment.
In case of Medical Emergency, call (630) 428-4143.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 84024 - R

EPA Est. No.: 6484-WI-001

JUSTEQ LLC
2536 Whitehall Lane
Naperville, IL 60564

Net Contents _____

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. CAUSES IRRIVERSABLE EYE DAMAGE. CAUSES SKIN BURNS. Do not get in eyes, on skin or on clothing. Wear protective eyewear such as face shield or safety glasses and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board Regional Office of EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

COOLING PONDS, RESERVOIRS AND DECORATIVE FOUNTAINS

Justeq07 may be applied at the reservoir, pond, or fountain inlet or at a location that permits complete diffusion into the water at maximum retention time before reaching the outlet. Sufficient Justeq07 should be fed to maintain a total chlorine level of 1.0-4.0 ppm in all parts of the reservoir or pond (two fluid ounces per 1000 gallons of water yields about 1.4 ppm total chlorine).

INDUSTRIAL & COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS

Justeq07 can be applied directly to the cooling water at any section of the system where sufficient mixing will occur. Apply Justeq07 to the cooling water to provide a total chlorine level of 1.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the systems. Check the total chlorine level with a test kit and additional product applied until a reading of 1.0-4.0 ppm is obtained at the bleed-off point. The product can be added to the system either continuously or intermittently or as needed to obtain the above residual. The frequency of feeding and dosage rate will depend upon the severity of the problem.

INDUSTRIAL PASTEURIZERS (Such as food, beverage, and industrial process pasteurizers)

For control of bacteria and fungi in industrial pasteurizers add 4 -8 ounces of Justeq07 per 1000 gallons of system water to achieve control. To maintain control add sufficient Justeq07 to maintain 2.0-4.0 ppm total chlorine throughout the system. (Two fluid ounces per 1000 gallons of water yields 1.4 ppm total chlorine.)

SHELL EGG PASTEURIZER WATER SYSTEMS

For control of bacteria, fungi and associated slime in shell egg pasteurizer water systems add 4-8 ounces of Justeq07 per 1000 gallons of system water to achieve control. To maintain control add sufficient Justeq07 to maintain 2.0-4.0 ppm total chlorine throughout the system. (Two fluid ounces per 1000 gallons of water yields 1.4 ppm total chlorine)

AIR WASHERS (This product may be used only in industrial air washers and air washer systems which have mist-eliminating components.)

For control of microorganisms in industrial air washer systems add sufficient Justeq07 to the air washer sump or chill water to provide a total chlorine level of 2.0-4.0 ppm. Badly fouled systems must be cleaned before treatment is begun. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained at the bleed-off point. Some systems may be maintained in satisfactory biological condition by applying this dosage once per day while others will respond

better to dosages less than once per day.

HEAT TRANSFER SYSTEMS (Such as Evaporative Condensers, Hydrostatic Sterilizers and Retorts, Dairy Sweetwater Systems, and Once-Through Cooling Water Systems)

Justeq07 should be used at the same application rates, and in the same manner as described above. It should be added to the system at a point of uniform mixing such as a basin area, sump area, or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

PULP & PAPER MILL INFLUENT WATER SYSTEMS

Justeq07 should be applied to the raw water intake prior to the filter house, economizer, or process water. Feed at a dosage sufficient to provide total a chlorine level of 2.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. The total chlorine level should be checked with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained. Some systems can be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. Justeq07 can be used in pulp and paper influent water systems where the manufactured paper or paperboard can be used for food contact purposes.

PULP & PAPER MILL PROCESS WATER SYSTEMS

Add Justeq07 to paper making systems at a point of uniform mixing such as the beaters, broke chest pump, save-all tank, or white water tank. Feed at a dosage sufficient to provide a total chlorine level of 2.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained. Some systems can be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. Justeq07 can be used in pulp and paper mill process water systems where the manufactured paper or paperboard can be used for food contact purposes.

STORAGE AND DISPOSAL

Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Do not reuse empty container but place in trash collection. Do not contaminate water, or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Pesticide disposal wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL Do not reuse empty container. Triple rinse (or equivalent). Then puncture and dispose of in a sanitary landfill, or, if allowed by State and Local authorities, by burning. If burned, stay out of smoke.

Justeq07

Justeq07 is an effective agent for controlling algae, bacteria, and fungi that produce slime in recirculating condensing and cooling equipment and in reservoirs or ponds that serve as the source of boiler feedwater or cooling water. Justeq07 can also be used to control bacteria, fungi and algae that produce slime in decorative fountains, air washers, paper mill water systems, and food, beverage, and industrial process pasteurizers.

ACTIVE INGREDIENTS:

Sodium hypochlorite	7.00%
Sodium bromide	1.50%

INERT INGREDIENTS	91.50%
--------------------------------	--------

Total	100.00%
-------------	---------

Total Available chlorine = approximately 6.7%

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses if present after the first 5 minutes, then continue rinsing eyes.
- Call a poison control center or a doctor for treatment advice.

If on skin or clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or a doctor for treatment advice.

If inhaled:

- Move to fresh air.
- If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or a doctor for further treatment advice.

If swallowed:

- Call a poison control center or a doctor immediately for treatment advice.
- DO NOT INDUCE VOMITING.
- Do not give anything to drink.

NOTE TO PHYSICIAN:

Aspiration may cause lung damage. Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container, label or MSDS with you when calling a poison control center or a doctor, or going for treatment. In case of Medical Emergency, call (630) 428-4143.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 84024 - R

EPA Est. No.: 6484-WI-001

JUSTEQ LLC
2536 Whitehall Lane
Naperville, IL 60564

Net Contents _____

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. CAUSES IRRIVERSABLE EYE DAMAGE. CAUSES SKIN BURNS. Do not get in eyes, on skin or on clothing. Wear protective eyewear such as face shield or safety glasses and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board Regional Office of EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

COOLING PONDS, RESERVOIRS AND DECORATIVE FOUNTAINS

Justeq07 may be applied at the reservoir, pond, or fountain inlet or at a location that permits complete diffusion into the water at maximum retention time before reaching the outlet. Sufficient Justeq07 should be fed to maintain a total chlorine level of 1.0-4.0 ppm in all parts of the reservoir or pond (two fluid ounces per 1000 gallons of water yields about 1.4 ppm total chlorine).

INDUSTRIAL & COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS

Justeq07 can be applied directly to the cooling water at any section of the system where sufficient mixing will occur. Apply Justeq07 to the cooling water to provide a total chlorine level of 1.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the systems. Check the total chlorine level with a test kit and additional product applied until a reading of 1.0-4.0 ppm is obtained at the bleed-off point. The product can be added to the system either continuously or intermittently or as needed to obtain the above residual. The frequency of feeding and dosage rate will depend upon the severity of the problem.

INDUSTRIAL PASTEURIZERS (Such as food, beverage, and industrial process pasteurizers)

For control of bacteria and fungi in industrial pasteurizers add 4 -8 ounces of Justeq07 per 1000 gallons of system water to achieve control. To maintain control add sufficient Justeq07 to maintain 2.0-4.0 ppm total chlorine throughout the system. (Two fluid ounces per 1000 gallons of water yields 1.4 ppm total chlorine.)

SHELL EGG PASTEURIZER WATER SYSTEMS

For control of bacteria, fungi and associated slime in shell egg pasteurizer water systems add 4-8 ounces of Justeq07 per 1000 gallons of system water to achieve control. To maintain control add sufficient Justeq07 to maintain 2.0-4.0 ppm total chlorine throughout the system. (Two fluid ounces per 1000 gallons of water yields 1.4 ppm total chlorine)

AIR WASHERS (This product may be used only in industrial air washers and air washer systems which have mist-eliminating components.)

For control of microorganisms in industrial air washer systems add sufficient Justeq07 to the air washer sump or chill water to provide a total chlorine level of 2.0-4.0 ppm. Badly fouled systems must be cleaned before treatment is begun. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained at the bleed-off point. Some systems may be maintained in satisfactory biological condition by applying this dosage once per day while others will respond

better to dosages less than once per day.

HEAT TRANSFER SYSTEMS (Such as Evaporative Condensers, Hydrostatic Sterilizers and Retorts, Dairy Sweetwater Systems, and Once-Through Cooling Water Systems)

Justeq07 should be used at the same application rates, and in the same manner as described above. It should be added to the system at a point of uniform mixing such as a basin area, sump area, or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

PULP & PAPER MILL INFLUENT WATER SYSTEMS

Justeq07 should be applied to the raw water intake prior to the filter house, economizer, or process water. Feed at a dosage sufficient to provide total a chlorine level of 2.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. The total chlorine level should be checked with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained. Some systems can be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. Justeq07 can be used in pulp and paper influent water systems where the manufactured paper or paperboard can be used for food contact purposes.

PULP & PAPER MILL PROCESS WATER SYSTEMS

Add Justeq07 to paper making systems at a point of uniform mixing such as the beaters, broke chest pump, save-all tank, or white water tank. Feed at a dosage sufficient to provide a total chlorine level of 2.0-4.0 ppm. Justeq07 at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 1.4 ppm of total chlorine, but several times that dosage may be required to provide a total chlorine level of 1.4 ppm throughout the system. Check the total chlorine level with a test kit and additional product applied until a reading of 2.0-4.0 ppm is obtained. Some systems can be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. Justeq07 can be used in pulp and paper mill process water systems where the manufactured paper or paperboard can be used for food contact purposes.

STORAGE AND DISPOSAL

Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Do not reuse empty container but place in trash collection. Do not contaminate water, or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Pesticide disposal wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

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Total 100.00%

Total Available chlorine = approximately 6.7%

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- ⊗ Take off contaminated clothing.
- ⊗ Rinse skin immediately with plenty of water for 15-20 minutes.
- ⊗ Call a poison control center or a doctor for treatment advice.

If inhaled:

- ⊗ Move to fresh air.
- ⊗ If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to mouth if possible.
- ⊗ Call a poison control center or a doctor for further treatment advice.

If swallowed:

- ⊗ Call a poison control center or a doctor immediately for treatment advice.
- ⊗ DO NOT INDUCE VOMITING.
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~5406756

From: Hardy.Michael@epamail.epa.gov
Sent: Monday, July 02, 2007 10:39 AM
To: Bob Sielaty
Cc: Mitchell.Emily@epamail.epa.gov; Luminello.Tom@epamail.epa.gov;
Hartman.Mark@epamail.epa.gov; Sanders.Frank@epamail.epa.gov
Subject: Re: New application

Attachments: EPA email response 19 Jun 07.doc; EPA Label 23 May 07.doc

Bob,

Per my earlier telephone conversation, AD will not require the submission of efficacy data for a non-public health use.... Also, AD will not require this application to be classified as "restricted use" but will accept label language consistent with the currently registered products you've cited below..... If you are using the formulator's exemption, you would not be required to submit generic data unless you are adding use sites that are not on the labeling of the registered technical source....

These determinations were reached in consultation with the Branch Chief, Mark Hartman, the Division Director, Frank Sanders, and myself..... Upon submission of your application, if you have any other questions, please let me know....

Michael Hardy
Ombudsman and Enforcement Team Leader
Antimicrobials Division
703-308-6432

"Bob Sielaty"
<rsielaty@toxcel.com>

06/29/2007 04:33
PM

Michael Hardy/DC/USEPA/US@EPA
To
cc
Subject
New application

Dear Michael -

As I mentioned on the phone, we represent a new company with no employees or a product, which is getting ready to file an application for a new product containing a combination of sodium hypochlorite and sodium bromide as the active ingredients (attached Justeq07 label). The mixture is very corrosive with a pH of 11.7, and similar to several existing registered products.

After trying for weeks to get a review of the pre-submission package in lieu of having a meeting, I received the attached email (see EPA comments to our questions highlighted) from Tom in Emily Mitchell's office.. The answers are not an acceptable approach and the conclusions concerning the proposed waiver requests are disturbing. At this stage, we don't want to either conduct acute toxicity studies, or accept stringent label requirements, such as DANGER, Skull & Crossbones, and

Page 1

~5406756

Restricted Use. Other similar labels do not contain more than a DANGER category, even though an NPIRS search reveals that there is little or no acute toxicity studies associated with them. I am appealing this decision because the laboratories agree with us that it is unethical to conduct such tests on animals with this very corrosive product that is substantially similar to other registered products, such as Brommax (63838-3), Stabrex (1706-179) and Stabrom (3377-74).

In addition, I don't see why it is necessary to submit efficacy data when the product is an industrial use and there are no public health claims. In any case, we are developing an efficacy study to use in California. Basically this is a bleach product and I believe is well-known to EPA reviewers!

The product is formulated with registered source actives under the Formulator's Exemption, and the inerts are on EPA's 3 and 4B lists. Therefore, I don't think E-fate, ecotox and toxicity data are necessary.

Can you please look into these matters for me? I am available in the office next week. Thanks.

Have a nice weekend.

Bob

Robert M. Sielaty, J.D.
Executive Director of Product Registration and General Counsel toXcel, LLC P.O. Box
363 7140 Heritage Village Plaza Gainesville, VA 20156
Tel: (703) 335-5670
Fax: (703) 310-6950
Email: rsielaty@toxcel.com

**THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE. Any unauthorized dissemination, distribution, or copying of this communication is strictly prohibited.

If you have received this communication in error, please notify the author immediately by telephone or email, and delete or destroy the message.**

(See attached file: EPA email response 19 Jun 07.doc)(See attached file: EPA Label 23 May 07.doc)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Thursday, May 24, 2007

MEMORANDUM

Subject: Acute Toxicity Review for EPA Reg. No.: 63838-5/ BromMax 7.1
DP Barcode: D339037

To: Emily Mitchell, PM 32/ Thomas Luminello
Regulatory Management Branch
Antimicrobials Division (7510C)

From: Ian Blackwell, Biologist
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510C)

Through: Karen Hicks, Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510C)

Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510C)

Applicant: Enviro Tech Chemical Services, Inc.

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Sodium hypochlorite	7.45
Sodium Bromide	10.28
<u>Other Ingredient(s):</u>	<u>82.27</u>
Total:	100.00%

for 84024-R
refer to this oral tox.

- 1) **BACKGROUND:** Enviro Tech Chemical Services, Inc., has submitted a rebuttal to a previous Chemistry and Toxicology Team (CTT) review of their product, BromMax 7.1.

a) The results of the last review were:

Study	MRID Number	Toxicity Category	Status
Acute Oral Toxicity	466272-02	IV	Acceptable
Acute Dermal Toxicity	466272-01	IV	Acceptable
Acute Inhalation Toxicity	None	?	Waiver denied/ Data Gap
Primary Eye Irritation	None	I	Waived
Primary Skin Irritation	None	I	Waived
Dermal Sensitization	Cited	Nonsensitizer	Acceptable

- b) For this submission (D339037), the registrant submits a Justification for Bridging and Request for Waivers For Acute Toxicity Data. This document lists the manner in which they chose to describe each of the six acute toxicity studies.

- 2) **RECOMMENDATIONS:** PSB findings are:

- a) **Acute Oral and Dermal Toxicity: CTT assigns 63838-5 toxicity category IV for acute oral and dermal toxicity.** Registration Number 63838-5 is a dilution of 63838-3. The acute oral and dermal toxicity studies conducted on 63838-3 were both assigned toxicity category IV. A dilution of 63838-3 would be expected to lessen the systemic effects of it; however, that would keep those studies in toxicity category IV.
- b) **Acute Inhalation Toxicity: CTT denies the waiver of the acute inhalation toxicity study for 63838-5.** The registrant states that the Sodium and Calcium Hypochlorites RED waived the requirement for acute inhalation toxicity for these compounds. A brief look at the CSF of 63838-5 and the post-reaction CSF of 63838-3 shows that these two products contain much more than just sodium and calcium hypochlorites.

c) Primary Eye and Skin Irritation: **CTT grants the waiver of the primary eye and skin irritation studies. The waiver is granted because the pH of (a 1% solution) of 63838-5 is 12.**

d) Dermal Sensitization: **CTT grants the waiver of the dermal sensitization study.** However, the waiver is due to the pH of the product, not due to the lack of sensitization properties of the ingredients (as postulated by the registrant). The toxicity category I classification of the primary skin irritation study calls for PPE. That PPE should prevent or limit the possibility of dermal contact, which should prevent the possibility of dermal sensitization.

The acute toxicity profile for Registration Number 63838-5 is currently:

Study	MRID Number	Toxicity Category	Status
Acute Oral Toxicity	466272-02	IV	Acceptable
Acute Dermal Toxicity	466272-01	IV	Acceptable
Acute Inhalation Toxicity			Data Gap
Primary Eye Irritation	None	I	Waived
Primary Skin Irritation	None	I	Waived
Dermal Sensitization	None	Nonsensitizer	Waived

3) LABELING:

- a) The signal word is "DANGER", based upon the classification of the primary eye and skin irritation studies.
- b) CTT cannot recommend additional precautionary statements due to the unaddressed acute inhalation toxicity study.

DATA PACKAGE BEAN SHEET

Date: 17-Jul-2007

Page 1 of 3

Decision #: 381092

DP #: (341682)

PRIA

Parent DP#:

*** Registration Information ***

Registration: 84024-R - JUSTEQ07

Company: 84024 - JUSTEQ, LLC

Risk Manager: RM 32 - Robert Brennis - (703) 308-6264 Room# CM-2 308G

Risk Manager Reviewer: Thomas Luminello, Jr. TLUMINEL

Sent Date: _____

Calculated Due Date: 28-Oct-2007

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A53) ME-TOO;NEW PRODUCT;FAST TRACK;

Ingredients: _____

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 17-Jul-2007

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

7/17/07

8/14/07

Last Possible Science Due Date: 28-Sep-2007

Team Name: CTT

7/17/07

8/14/07

Science Due Date: 8/31/07

Reviewer Name: Dan Blackwell

7/19/07

8/14/07

Sub Data Package Due Date: 9/15/07

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

Printed on Page 3

*** Data Package Instructions ***

Acute Tox please review the attached cover letter, CSF, Label and MRID# 471746-04 (acute tox waiver requests) submitted to support registration of subject's product.

NEW APPLICATIONS

DATE: 7/11/07

FILE NUMBER: 84024-R

FEP (OPPIN ENTRY) AC 7/11/07
(Initial & date)

FILE ROOM: _____
(Initial & date)

SIG: _____
(Initial & date)

FILE ROOM: _____
(Initial & date)

✓ ASSIGN TO PM 32 (NO DATA)

____ JACKET TO SHELF (DATA)

Tuesday, August 14, 2007

Note to PM Team

Concerning the denial of the waiver of the acute oral toxicity study for Registration Number 84024-R, the reasons are:

- There is no Agency guidance for the waiver of acute oral toxicity studies based upon pH.
- CTT compared this product to the acute toxicity profile Registration Number 63838-5. That product has the same active ingredients in higher concentration than 84024-R. While the registrant is requesting a toxicity category I for 84024-R, the acute oral toxicity category of 63838-5 is IV.